

Exhibit 19

PLAINTIFF HARFORD COUNTY BOARD OF EDUCATION OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT (HARFORD) (SD MSJ NO. 6)

Case No.: 4:22-md-03047-YGR
MDL No. 3047

Member Case No.: 4:23-cv-03065-YGR

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

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Page 1

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 IN RE: SOCIAL MEDIA ADOLESCENT |
4 ADDICTION/PERSONAL INJURY | MDL NO.
5 PRODUCTS LIABILITY LITIGATION | 4:22-md-3047-YGR

6 This Document Relates to:

7 Board of Education of
8 Harford County v.
9 Meta Inc., et al.

10 Case No. 4:23-cv-03065

11 * CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER *

12 VIDEOTAPED DEPOSITION OF JILLIAN LADER,
13 a witness herein, called by the defendants for
14 examination, taken by and before Ann Medis, RPR,
15 CLR, CSR-WA, and Notary Public in and for the
16 Commonwealth of Pennsylvania, at the Harford
17 County Public Schools Central Administration
18 Building, 102 South Hickory Avenue, Bel Air,
19 Maryland 21014, on Monday, May 12, 2025,
20 commencing at 10:04 a.m.

CONFIDENTIAL

Page 2

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8 Operations, LLC; Facebook Payments, Inc.; Facebook
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Page 3

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19 Also present

20 Lauren L. Drive, Deputy General Counsel, Harford County
21 Public Schools
22 Nick Lee (via Zoom)
23 Bradley Loy, videographer
24 Jacob Arndt, trial tech

CONFIDENTIAL

Page 4

1	* I N D E X *		
2	JILLIAN LADER	PAGE	
3	EXAMINATION BY MR. WHITELEY	6	
4	* INDEX OF HCPS/LADER EXHIBITS *		
5	NO.	DESCRIPTION	PAGE
6	Exhibit 1	Jillian Lader resume	9
7	Exhibit 2	Email chain, 7/12/18, from R. Villareal to J. Lader, subject: RE: Wednesday Learning Camps 2018 HCPS_0051736 - 0051769	38
8	Exhibit 3	Student/parent handbook for the '18/19 school year HCPS_00264167 - 00264188	40
9	Exhibit 4	Email chain, 8/15/23, from J. Lader to Board of Education, et al., subject: Links to "Welcome Back to School" Video Messages from Dr. Bulson and Dr. Poynton/Mrs. Hahn HCPS_00048089 - 00048091	44
10	Exhibit 5	2024-2025 Parent-Student Handbook Calendar	47
11	Exhibit 6	Email chain, 4/15/19, from S. Wall to J. Lader, subject: RE: Social Media HCPS_00539771	50
12	Exhibit 7	HCPS Analytics, March 2019 HCPS_00539772	51
13	Exhibit 8	Email chain, 6/22/21, from J. Lader to S. Wall, subject: FW: Final Reminder: Facebook Analytics is going away soon HCPS_00538420 - 00538422	56
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			

CONFIDENTIAL

Page 5

* INDEX OF HCPS/LADER EXHIBITS (Continued) *		
NO.	DESCRIPTION	PAGE
1	Exhibit 9 HCPS Social Media Guide HCPS_00324925 - 00324934	57
2		
3	Exhibit 10 Communications section of the budget document HCPS_00347775 - 00347776	73
4		
5	Exhibit 11 Fiscal 2020 Communications section of the budget document HCPS_00345353 - 00345354	75
6		
7	Exhibit 12 Email chain, 10/4/21, from J. Lader to D. Merlock, subject: RE: Two Things :) HCPS_00538342 - 00538345	81
8		
9	Exhibit 13 Screen capture of a post on HCPS's Instagram account	85
10		
11	Exhibit 14 Email chain, 2/27/23, from K. Andersen to J. Berends, re video related to music that HCPS posted HCPS_00467611 - 00467612	90
12		
13	Exhibit 15 Plaintiff Board of Education of Harford County's Amended Objections and Responses to Defendants' Interrogatories (Set 3)	91
14		
15	Exhibit 16 Email chain, 10/19/21, from M. Stapleton to J. Lader, subject: RE: Parent Academy Social Media 101 HCPS_00465458 - 00465460	97
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

CONFIDENTIAL

Page 6

1 P R O C E E D I N G S

2 - - - -

3 THE VIDEOGRAPHER: We are now on the
4 record. My name is Bradley Loy. I'm a
5 videographer for Golkow. Today's date is May 12,
6 2025. The time is 10:04.

7 This video deposition is being held at
8 102 South Hickory Avenue, Bel Air, Maryland.
9 We're here in the matter of Social Media CA MDL
10 3047, Board of Education of Harford County versus
11 Meta for the United States District Court,
12 Northern District of California.

13 The deponent is Jillian Lader.

14 Counsel will be noted on the
15 stenographic record. The court reporter is Ann
16 Medis and will now swear in the witness.

17 JILLIAN LADER,

18 having been first duly sworn, was examined
19 and testified as follows:

20 EXAMINATION

21 BY MR. WHITELEY:

22 Q. Good morning.

23 A. Good morning.

24 Q. Could you please state your full name
25 for the record.

CONFIDENTIAL

Page 7

1 A. Jillian Lader.

2 Q. Ms. Lader, have you ever been deposed
3 before?

4 A. No, I have not.

5 Q. I'm going to cover a few ground rules so
6 we're on the same page.

7 Do you understand that you are under
8 oath today?

9 A. Yes.

10 Q. And you understand that you have to give
11 truthful testimony as if you were in front of a
12 court?

13 A. Yes.

14 Q. Because the court reporter is going to
15 be taking down everything that we say today, I ask
16 that you pause a little bit before answering the
17 question, and I will pause to make sure that you
18 answered the question before I ask my next
19 question. Okay?

20 A. Yes.

21 Q. Another reason to pause is your counsel
22 may make objections at various points throughout
23 the deposition. And you can still continue to
24 answer the question so long as your counsel does
25 not instruct you to not answer the question.

CONFIDENTIAL

Page 8

1 Does that make sense?

2 A. Understood.

3 Q. I'll also ask if one of my questions is
4 unclear or you didn't hear part of it, just ask me
5 to repeat it or clarify, and I'm happy to do so.

6 If you answer the question, we'll assume
7 that you've understood the question.

8 A. Yes.

9 Q. We talked about this a little bit
10 already, but if you ever need a break, that's
11 okay. Just let us know. But the only exception
12 to that rule is if I've asked the question, you
13 need to give an answer on the record before we go
14 on a break. Understood?

15 A. Understood.

16 Q. Is there any reason you can't give
17 truthful and accurate testimony today, such as
18 being on medication?

19 A. No.

20 Q. Where are you employed, Ms. Lader?

21 A. Harford County Public Schools.

22 Q. What is your title or role at Harford
23 County Public Schools?

24 A. My official title is manager of
25 communications. That means that I'm directing all

CONFIDENTIAL

Page 9

1 communications for the school system.

2 Q. If I refer to Harford County Public
3 Schools as Harford or HCPS today, you'll
4 understood that refers to the school district?

5 A. Yes.

6 (HCPS/Lader Exhibit 1 was marked.)

7 BY MR. WHITELEY:

8 Q. I'm going to mark Exhibit 1 Tab 35.
9 This is a copy of your resume that counsel
10 provided to us.

11 A. Can I -- Daniel, when you refer to --
12 can you refer to Harford or HCPS, will you use
13 HCPS. Harford, just in my capacity, sometimes I
14 think of government. So I just want to make sure
15 I'm clear on that.

16 0. I'll try to use HCPS.

17 Do you have a copy of Exhibit 1 in front
18 of you?

19 A. Yes.

20 Q. Is this your resume?

21 A. Yes.

22 Q. Does this look like an up-to-date and
23 current copy?

24 A. Yes.

25 0. You have been the manager of

CONFIDENTIAL

Page 10

1 communications at HCPS since 2014; correct?

2 A. Correct.

3 Q. What are your responsibilities as the
4 manager of communications?

5 A. As the manager of communications, I'm
6 overseeing internal and external comms in order to
7 insure that our community is kept up to date, is
8 informed and is aware of any pertinent information
9 to the school system and to the instruction of
10 their children.

11 Q. You said internal and external
12 communications. What do you mean by that?

13 A. Correct. So internally we're ensuring
14 that we're keeping our staff informed of
15 information. Externally we're ensuring that we
16 are keeping parents and guardians and the
17 community aware of what's going on in Harford
18 County Public School.

19 Q. Do internal communications also include
20 communications to students?

21 A. Not from my office. I do not
22 communicate directly with students proactively in
23 my office.

24 Q. Is there somebody in HCPS or a
25 department in HCPS that does so?

CONFIDENTIAL

Page 11

1 A. I'm hesitating because many departments
2 have to communicate with students for different
3 purposes. However, there is not one specific
4 department that handles all communications with
5 students.

6 Q. So if there's an inclement weather delay
7 at HCPS, how would that get communicated to
8 students?

9 A. I communicate an inclement weather delay
10 out to our community, our staff and our parents
11 and guardians. That information would be relayed
12 to students via their families and/or they could
13 see that information posted in multiple places
14 that are public facing, such as our website,
15 social media, different places like that. News
16 outlets share our inclement weather information.
17 I do communicate directly with the press.

18 Q. Do you have any direct reports as the
19 manager of communications?

20 A. Yes.

21 Q. Who are they?

22 A. I have a public information specialist
23 who reports directly to me as well as a
24 videographer. And then peripherally the
25 switchboard at central office reports directly to

CONFIDENTIAL

Page 12

1 me. That has one full-time staff member and
2 multiple substitutes who support that position.

3 Q. And what is the switchboard position?

4 A. The switchboard is the desk at the lobby
5 of Central Office, so the individual greeting and
6 admitting people into Central Office.

7 Q. And who is that public information
8 specialist?

9 A. His actual name?

10 Q. Yes.

11 A. Kyle Andersen. And that's Andersen
12 S-E-N at the end.

13 Q. Can you give me the name of the
14 videographer who reports to you?

15 A. Jay Berends, B-E-R-E-N-D-S.

16 Q. What are Mr. Andersen's responsibilities
17 as a public information specialist?

18 A. Supporting all efforts in the
19 communications office. Up until a year and a half
20 ago, I was doing all of those responsibilities by
21 myself. So now, fortunately, we have two
22 individuals, himself and myself, who support any
23 kind of emergency situation in the schools, those
24 day-to-day communications to keep families and
25 staff informed, anything that comes out of the

CONFIDENTIAL

Page 13

1 communications office, when we celebrate things,
2 when we're following up and making sure that
3 people are aware of any changes, anything that
4 would be pertinent to ensuring that connection
5 remains in place between families and their
6 students' instruction.

7 Q. So other than those individuals you've
8 listed so far, does anybody else fall under the
9 communications office for HCPS?

10 A. No.

11 Q. You've been at HCPS for about 20 years
12 now?

13 A. Correct.

14 Q. Looking at your resume, you were the
15 staffing specialist from 2012 to 2014; correct?

16 A. Correct.

17 Q. What were your responsibilities as the
18 staffing specialist?

19 A. It has been several years, but in human
20 resources, I had several different
21 responsibilities, as you'll see. But as the
22 staffing specialist, that's when primarily I was
23 supporting all middle schools to ensure that they
24 had all of their teaching positions filled and, in
25 addition, supporting the -- it was called Smart

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Page 14

1 Find Express, which was the system used to staff
2 all substitutes for the school system,
3 instructional substitutes.

4 And in that staffing specialist
5 capacity, I also designed and ran the entire
6 recruitment program, and that was for the entire
7 system, not just middle school.

8 Q. Was that a recruitment program for all
9 types of employees for HCPS, or was it
10 specifically like teachers?

11 A. Primarily instructional.

12 Q. And so when you were recruitment
13 specialist from 2008 to 2012, did you have similar
14 responsibilities to what you just described?

15 A. Correct, minus the staffing for all
16 middle schools.

17 Q. And you were investigations specialist
18 from 2006 to 2008?

19 A. Correct.

20 Q. And what were your responsibilities as
21 an investigations specialist?

22 A. That was overseeing all background and
23 criminal checks of any staff member coming in, so
24 conducting fingerprinting, maintaining those
25 files, following up with any additional

CONFIDENTIAL

Page 15

1 information that would come back as those
2 fingerprinting checks went in and then following
3 up with my supervisor, head of investigations, so
4 that they could then proceed with any action that
5 may be necessary.

6 Q. Prior to that, from 2005 to 2006, you
7 were a paraeducator; right?

8 A. Yes.

9 Q. What is a paraeducator?

10 A. Paraeducator is one of the best jobs I
11 believe in the school system where I got to be in
12 the classroom working with pre-K students on the
13 daily and ensuring that I was supporting the
14 teacher and the students directly with any needs
15 they had. That could be anything from supporting
16 an individual student who had a specific learning
17 need that needed additional support, to supporting
18 the teacher in making bulletin boards if she so
19 desired, whatever she needed in the classroom.

20 Q. Were you stationed at a particular
21 school in the district?

22 A. Yes.

23 Q. Which school was that?

24 A. Falls Crossroads Elementary School.

25 Q. Setting aside the paraeducator role, for

CONFIDENTIAL

Page 16

1 every other role you've had at Harford, have you
2 been stationed in the main administrative building
3 for HCPS, or were you stationed at a particular
4 school?

5 A. In Central Office, A.A. Roberty
6 Building.

7 Q. What is the address of that office?

8 A. 102 South Hickory Avenue.

9 Q. Are there any classes for students held
10 at that building?

11 A. Not that I'm aware of.

12 Q. In your role as manager of
13 communications from 2014 to present, how often do
14 you visit schools and districts?

15 A. As often as I can. I have the privilege
16 of attending events to either cover those events
17 to share them on, for example, our website, or it
18 may be that they are asking me to come speak with
19 students about a career in communications.

20 Another example is I have the privilege of running
21 the Littles University program with the Harford
22 County Education Foundation.

23 That is a program where I have the -- I
24 get to give away books to students and children
25 who have not joined the school system yet, so

CONFIDENTIAL

Page 17

1 birth through age five. We have special programs
2 out in the schools called the Judy Centers, and
3 that's where the school system supports families
4 prior to entering school. So I get to go and read
5 to those groups occasionally and give them
6 additional free books as a resource.

7 Q. How often are you in high schools in the
8 district during instruction time compared to a
9 normal school day?

10 A. I wouldn't say that I am in the high
11 schools during instructional time often. That is
12 on the rare occasion that there's like a specific
13 event they've asked me to attend. So I wouldn't
14 consider that during instruction.

15 Q. What about just during the normal school
16 day?

17 A. During the normal school day, I wouldn't
18 say that I'm in the buildings often. I'm dealing
19 with the high schools often, but that's usually
20 via phone and email and communicating that way to
21 support the schools when they're -- when they need
22 communication support.

23 Q. Understood. If you could estimate,
24 would it be more often than once a month that
25 you're in high schools during the school day?

CONFIDENTIAL

Page 18

1 A. Yes.

2 Q. More often than once a week?

3 A. Maybe two or three times a month.

4 Q. Same question for being at middle
5 schools during the school day in the district, how
6 often is that?

7 A. I'd say the same, about two or three
8 times a month. And the same thing with
9 elementary. My support is typically constant and
10 via phone and email.

11 Q. What about Mr. Andersen, do you know how
12 often he is at high schools or middle schools in
13 the district during the school day?

14 A. I try to utilize his time more often to
15 be in the building. In my capacity, I have to be
16 available for all 54, and I hate when I have to
17 leave an event in order to support one of the
18 other schools with an emergency, which with 54
19 schools and 40,000 students, more often than not,
20 I'm dealing with some emergency somewhere.

21 So I do have the privilege of sending
22 Mr. Andersen and Mr. Berends into the buildings
23 much more frequently. Mr. Andersen, I would say
24 probably two or three times a week would be a more
25 accurate statement. Mr. Berends is more often

CONFIDENTIAL

Page 19

1 than that, because our goal with our videographer
2 position is to capture as much as we can on video.

3 So 90 percent of his time is in the
4 buildings, and then the other 10 percent -- we are
5 lucky enough to have a studio here in Central
6 Office that he can utilize. So while we try to
7 get out to the schools more frequently, for the
8 convenience of staff and students and, of course,
9 the visual representation of what's actually
10 happening versus utilizing the studio for things
11 like speeches and direct communications that have
12 been scripted.

13 Q. So what does this video footage that
14 Mr. Berends prepares get used for?

15 A. For promoting any positive event that's
16 happened, to share that with the rest of the
17 community. It's also used to share examples of
18 messaging and information that we need parents and
19 guardians to be aware of.

20 For example, one of the more recent
21 safety and security videos where we were sharing
22 images of what our new safety -- I'm sorry --
23 weapons detection materials look like so that we
24 could inform parents and guardians what they would
25 see when they're entering places like a stadium or

CONFIDENTIAL

Page 20

1 a school for an event after hours since now we
2 have to ensure that we have those additional
3 security measures in place.

4 Q. These security measures that you're
5 describing, when did the district implement them?

6 A. After September of 2024 when there was a
7 shooting at Joppatowne High School. That is when
8 communications and action really got into full
9 force. The security measures, the stanchions that
10 you walk through as you go into places like the
11 stadiums for events, those really came into full
12 force within the last couple months. I apologize
13 I don't have the exact date in mind.

14 Q. But safe to say within the '24/25 school
15 year?

16 A. Yes.

17 Q. Are those metal detectors?

18 A. Weapons detection systems, not metal
19 detectors. Sorry I cut you off, but I want to
20 make sure.

21 Q. Are those weapons detection systems
22 installed at all high schools in the district?

23 A. Not installed. They are portable. Yes,
24 there is one at each high school so that then it
25 can also be moved to a middle or elementary school

CONFIDENTIAL

Page 21

1 if needed. We have not expanded to elementary
2 school yet.

3 Q. And do all high school students in the
4 district have to walk through one of these every
5 day when they're entering the school building?

6 A. No. There is a permanent one at
7 Joppatowne High School, which again is where we
8 had a shooting in the school.

9 Q. Do you know how often the portable ones
10 are used at other high schools in the district?

11 A. I do not know. Let me share that I do
12 know that they are being used and they are being
13 seen. I've had a few comments on the Facebook
14 page come through on the post where we were
15 sharing the information about the new safety
16 equipment.

17 And the comments -- there were some
18 individuals who commented about why weren't we
19 seeing them everywhere. That's where we were
20 getting some of that feedback as well.

21 Q. Prior to joining HCPS, were you working
22 somewhere prior to that in 2005?

23 A. Yes. For approximately six months, I
24 was employed in Montana with the Missoula
25 Children's Theater.

CONFIDENTIAL

Page 22

1 Q. Was your first position at HCPS your
2 first position at a school district?

3 A. Yes.

4 Q. Prior to HCPS, had you ever worked in a
5 school?

6 A. Yes.

7 Q. When was that?

8 A. In college when I was on breaks, I would
9 worked as a substitute teacher.

10 Q. And where were you substitute teacher?

11 A. In Harford County Public Schools.

12 Q. Do you have any idea of how many times
13 you served as a substitute?

14 A. No, I do not.

15 Q. More or less than 20, if you had to
16 guess?

17 A. Probably less. As a college student, I
18 was typically doing it on breaks and probably kept
19 it to a minimum.

20 Q. Do you have an understanding of what the
21 district is alleging in this lawsuit?

22 A. I believe so.

23 Q. And what is your understanding?

24 MR. LEGG: Objection. Form.

25 THE WITNESS: So I would say that my

CONFIDENTIAL

Page 23

1 understanding of the lawsuit is bringing to light
2 the detriments and the dangers of social media to
3 children.

4 BY MR. WHITELEY:

5 Q. And where did you get that understanding
6 of the lawsuit? Did you read the Complaint?

7 MR. LEGG: Objection. Form. Also to
8 the extent it calls for any discussions you may
9 have had with counsel.

10 But you can answer.

11 THE WITNESS: I was made aware that HCPS
12 had been selected as a plaintiff in a case about
13 social media use among adolescents.

14 BY MR. WHITELEY:

15 Q. I want to know the time period. When
16 were you made aware of that?

17 MR. LEGG: Same objection.

18 You can answer to the extent it doesn't
19 include any communications with counsel.

20 MR. WHITELEY: I'm asking about a fact.
21 That's not privileged.

22 MR. LEGG: She can answer.

23 THE WITNESS: I'm trying to recall when
24 the first time was. In my capacity, I also read
25 the news on a regular basis as part of my job, be

CONFIDENTIAL

Page 24

1 aware. So I understood that there was a national
2 look at the damages and implications of social
3 media with adolescents. I don't recall when I
4 first saw that.

5 Within the last few months is when I was
6 informed that HCPS would be participating as well.

7 BY MR. WHITELEY:

8 Q. Were you involved at all in the decision
9 on behalf of HCPS to file this lawsuit?

10 A. No.

11 Q. Have you ever reviewed the Complaint
12 that HCPS has filed?

13 A. I do not believe I read the entire
14 Complaint, no.

15 Q. Have you read part of the Complaint?

16 A. I feel like I may have seen parts of it,
17 but I truly -- like I said, because I read so much
18 about education in general and any implications
19 such as social media use, I do not know if I am
20 blending that memory with articles I read in
21 general about suits against us or HCPS. I
22 apologize.

23 Q. Understood. Have you been asked to
24 prepare or assist in preparing discovery responses
25 on behalf of the district?

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Page 25

1 MR. LEGG: Object to the form.

2 THE WITNESS: I don't believe so. I was
3 asked to provide my resume.

4 BY MR. WHITELEY:

5 Q. What did you do to prepare for your
6 deposition today?

7 A. I didn't really do much to prepare.
8 This is my day to day. I deal with social media
9 on a regular basis in my capacity. So this is
10 kind of my normal everyday discussion,
11 conversation, job essentially.

12 Q. Did you meet with any employees of HCPS
13 to prepare?

14 A. I did meet with Ms. Drive on Friday as
15 she was aware I had never done a deposition
16 either. It sounded like the same ground rules
17 that you shared.

18 Q. Who is Ms. Drive?

19 A. Ms. Drive is in our General Counsel
20 Office. I don't know the title. I'm so sorry.

21 Q. She's a lawyer for HCPS?

22 A. Yes.

23 Q. How long was your meeting with
24 Ms. Drive?

25 A. Less than an hour.

CONFIDENTIAL

Page 26

1 Q. Other than your meeting with Ms. Drive,
2 did you have any meetings with any other HCPS
3 employees?

4 A. No.

5 Q. Did you review any documents to prepare
6 for your deposition today?

7 A. The only document I looked at again was
8 my resume when asked for it.

9 Q. Have you reviewed any deposition
10 transcripts of any other HCPS employees who have
11 been deposed in this case?

12 A. No.

13 Q. Other than HCPS employees, have you
14 talked with anybody else about your deposition
15 today?

16 A. No.

17 Q. And you said that talks about social
18 media is a part of your normal day to day.

19 Can you explain what you mean by that?

20 A. What I mean by that is that we are using
21 social media daily, whether it is to share
22 information from the school system or to share,
23 for example, an event that happened at a school or
24 if I am dealing with the repercussions of a
25 comment or a post made by someone and then having

CONFIDENTIAL

Page 27

1 to solve -- address that issue.

2 Q. Could you talk a little bit about what
3 you mean by dealing with the repercussions of a
4 comment or post on social media?

5 A. For example, on Friday when Bel Air High
6 School -- I received a call from the chief of
7 police of Bel Air stating that they received a
8 call with an individual who was claiming to be in
9 the school claiming to be prepared to self harm.

10 As a result of that, I was working on
11 communications to inform the families and staff at
12 the school of the current situation before I was
13 able to proactively put information out. Comments
14 were being made on prior Harford County Public
15 Schools' posts that had nothing to do with the
16 event. And they were stating things like naming
17 specific weapons. They were saying that it was a
18 student at the school. They were providing all
19 kinds of false information that then while in the
20 thick of trying to get the accurate information
21 out, I was having to address the fact that that
22 information was inaccurate while also walking that
23 fine line between free speech, which I find very
24 challenging and detrimental when it comes to
25 social media, that individuals will try to use

CONFIDENTIAL

Page 28

1 that as an excuse to write whatever they want in
2 the comment section.

3 So while dealing with that, that's the
4 most recent example of an issue of someone writing
5 something on social media that then makes it
6 extremely difficult to get through and navigate
7 the actual communications that need to be made.

8 Q. This incident you described, that
9 happened last Friday, May 9?

10 A. Yes. Friday was May 9.

11 Q. Somebody had conveyed a threat either to
12 themselves or others over the phone?

13 A. An individual called the suicide
14 hotline. That was routed to Bel Air Police
15 Department when the individual claimed to be
16 inside Bel Air High School making the call. And
17 they very clearly stated that it was a threat of
18 personal harm.

19 I am getting call from the chief of
20 police.

21 MR. WHITELEY: Take a break?

22 MR. LEGG: Sure.

23 THE VIDEOGRAPHER: We are off the record
24 at 10:32.

25 (Recess from 10:32 a.m. to 10:48 a.m.)

CONFIDENTIAL

Page 29

1 THE VIDEOGRAPHER: We are on the record
2 at 10:48.

3 BY MR. WHITELEY:

4 Q. Ms. Lader, did you bring any documents
5 with you to your deposition today?

6 A. No.

7 Q. Did you take any notes in your
8 preparation for this deposition?

9 A. No.

10 Q. Have you ever received any training from
11 HCPS about how to approach public statements and
12 interviews on behalf of the district?

13 A. No.

14 Q. Do you provide training to other HCPS
15 employees on how to approach public statements or
16 interviews?

17 A. I'm sorry. Can you repeat that?

18 Q. Do you provide training to other HCPS
19 employees on how to handle public statements or
20 interviews?

21 A. I will coach. For example, if you have
22 a media inquiry and we're addressing a specific
23 situation in the media, I will prep the individual
24 who is the expert in order to be prepared to speak
25 clearly to the media. That is more based around

CONFIDENTIAL

Page 30

1 how to answer a media question because, as we all
2 know, media has changed. And so sound bites are
3 key. And so ensuring that they get to the point
4 that they want to be heard on the news broadcast
5 is my goal.

6 Q. When you say prep the expert, do you
7 mean the individual who has the relevant knowledge
8 about a particular topic or incident?

9 A. Correct. For example, if we get an
10 inquiry about a situation and we need Mr. Brooks,
11 our chief of security, to speak to it directly, we
12 would just go over what we anticipate the
13 questions will be and what points he wants to get
14 across.

15 Q. How do you prepare them how to respond
16 to questions?

17 A. By asking example questions, talking
18 through what we think may be asked based on the
19 situation, and then having them run through sample
20 answers.

21 Q. You said sound bites are key. What did
22 you mean by that?

23 A. Correct. When you're dealing with the
24 media -- and like I said before, with media these
25 days, everyone wants a quick 30 seconds. They

CONFIDENTIAL

Page 31

1 don't want a long drawn-out response. They're not
2 going to -- the attention span has shrunk
3 drastically. We see that, for example, with
4 students on TikTok, students on SnapChat, that
5 that attention span is very short, and that has
6 leaked into things like main stream media, in my
7 opinion.

8 So in order to ensure that the key
9 information that we need to share in any given
10 situation makes that news clip, makes that sound
11 bite, I will do my best to prepare that individual
12 who is going on camera to ensure that that
13 information is in that 30 seconds so that it can't
14 be cut up into something else and then our message
15 gets lost.

16 Q. You referenced students on TikTok and
17 students on SnapChat.

18 Do you have any data showing changes in
19 the attention span of HCPS students over the last
20 few years?

21 A. Absolutely. I would say that we have
22 had to adjust our process for how long we make a
23 video. And actually let me clarify, because you
24 said students, and most of my communications, I
25 cannot say that I'm going directly to students.

CONFIDENTIAL

Page 32

1 My communication is to parents, guardians, staff,
2 community, and that includes students and HCPS.

3 For example, the video that I referenced
4 earlier about the safety and security measures,
5 obviously students I'm sure saw that video even
6 though I didn't necessarily send it directly to
7 them. But I would say that we have learned over
8 time because you can check the analytics on
9 videos. You can see how long someone continued
10 watching. And we could see over time when we
11 first started making videos, they may be five
12 minutes long.

13 Now it is a rule of thumb you do not go
14 over a minute 30 seconds. That's just within my
15 ten years. I would say it's less than 10 years
16 because we really didn't start making videos until
17 probably about five to six years ago, and that was
18 prior to me having a videographer full time on
19 staff. He was previously in the technology
20 department. And I was able to utilize his skills
21 and resources through collaboration with our
22 technology department.

23 Q. Other than the analytics you referenced
24 in your answer, what other data are you aware of
25 about the attention spans of HCPS students?

CONFIDENTIAL

Page 33

1 A. I do not have additional data about HCPS
2 student attention spans.

3 Q. When you're looking at those analytics,
4 does it tell you who is watching a video, a parent
5 versus a student?

6 A. The issue with social media is you never
7 know who is behind that handle. So, no, I could
8 not specifically say whether it was an adult or a
9 child.

10 Now, I will say that there are instances
11 where I can make an educated guess. For example,
12 on a snow day, say one of our neighboring counties
13 closes schools and we don't. When I get a message
14 that says something like "Hey, nah, bruh," I'm
15 pretty sure that's not an adult. I'm pretty sure
16 that's a child commenting their displeasure with
17 our decision not to close school.

18 Q. Are you aware of any data that HCPS has
19 that tracks how many of its students use TikTok?

20 A. Not that I'm aware of.

21 Q. Same question, but for SnapChat, are you
22 aware of any such data?

23 A. No. I do not track students' uses of
24 social media.

25 Q. That also goes for Facebook and

CONFIDENTIAL

Page 34

1 Instagram?

2 A. Again, I would reiterate we can't know
3 who is on the other side of that handle. So while
4 it may appear to be a student, while I may be able
5 to -- for example, when I've had issues where
6 students were either using extremely little foul
7 language on social media and I can say it was
8 students because I was able to click onto that
9 profile name, go to that profile, a lot of times
10 it would be something as simple as identifying a
11 jersey, a high school jersey, and then going to
12 that school with the photo because the names
13 usually aren't -- like I said, it's not the
14 student's actual name at their handle.

15 But by identifying their jersey, I was
16 able to go to the school and say, do you recognize
17 this student? If they did, I was able to share
18 with them, for example, some of the offensive
19 language that I personally have been called or
20 that the school system had been called, because to
21 me, that's an opportunity to educate that child as
22 to the fact that when they do put something on
23 social media, there is another human being on the
24 other side of it, and also that that's then out
25 there in the world forever. It will follow them.

CONFIDENTIAL

Page 35

1 Q. My question was: Are you aware of any
2 data that HCPS has that tracks how many of its
3 students use Facebook?

4 A. Correct. And I shared that there is no
5 data because you can't be certain who's behind
6 each of those handles, but wanted to give an
7 example of how sometimes I am able to identify
8 that it's a student.

9 Q. Well, since you do have a hard stop
10 today, I'll ask that you save your examples for
11 opposing counsel's questioning, if he has them.
12 But I'll try to make my questions "yes" or "no."

13 Are you aware of any data that HCPS has
14 that tracks how many of its students use
15 Instagram?

16 A. No.

17 Q. Are you aware of any data that HCPS has
18 of how many of its students use YouTube?

19 A. No.

20 Q. HCPS has accounts on YouTube, Facebook,
21 Instagram and also Twitter; correct?

22 A. Correct.

23 Q. Does it have a SnapChat account?

24 A. Absolutely not.

25 Q. Did it have a TikTok account?

CONFIDENTIAL

Page 36

1 A. Absolutely not.

2 Q. How often does HCPS post to its Facebook
3 account?

4 A. Daily.

5 Q. How often does HCPS post to its
6 Instagram account?

7 A. Typically if it is going on Facebook, we
8 are also sharing it on Instagram, but not in every
9 instance because of the different parameters
10 around each social media platform, for example,
11 Instagram always requiring an image.

12 So if it's information that does not
13 have an image that goes along with it, it may not
14 be on Instagram. But for the most part, it is a
15 daily process.

16 Q. About how often does HCPS post to its
17 YouTube account?

18 A. That is less frequent given the amount
19 of time it that takes to create videos. Maybe
20 once or twice a week tops, two times a week. That
21 would be an extremely busy time of year with video
22 messaging.

23 Q. Are you the person at HCPS who decides
24 when the district will post content to one of
25 these accounts?

CONFIDENTIAL

Page 37

1 A. Correct. Now, for YouTube, absolutely
2 it's 100 percent my decision. Facebook and
3 Instagram, the public information specialist may
4 have some leeway there, especially if I am not
5 available for an immediate decision.

6 Q. Mr. Andersen could decide on his own to
7 make a post on those platforms?

8 A. Correct, yes.

9 Q. Who drafts or creates the content that
10 HCPS uses to post to its Facebook and Instagram
11 accounts?

12 A. That would be myself or Mr. Andersen or
13 we may be sharing content from another school.

14 Q. For YouTube, is that review of
15 Mr. Andersen with the involvement with
16 Mr. Berends?

17 A. No. Mr. Berends would be primarily
18 posting on there, but the timing of that is a
19 conversation with me.

20 Q. HCPS provides links to its YouTube
21 account on its webpage; right?

22 A. Correct.

23 Q. The same is true for its Facebook and
24 Instagram accounts?

25 A. Correct.

CONFIDENTIAL

Page 38

1 MR. WHITELEY: If you could pull up link
2 and display it for the witness. For the record,
3 this is the HCPS website HCPS.org.

4 BY MR. WHITELEY:

5 Q. You can see it?

6 A. Correct.

7 Q. Does this look like the HCPS website to
8 you?

9 A. Yes.

10 Q. And that blue banner at the bottom,
11 those are those links to the platforms we just
12 talked about that are in there on the left-hand
13 side of the banner?

14 A. Correct.

15 Q. This banner is present at the bottom of
16 every page on HCPS' website; right?

17 A. I imagine it is, yes. I believe that
18 does stay on every additional page. But unless
19 you want to click through hundreds, I can't say
20 for sure.

21 Q. If you click on one of these, it will
22 take you to those accounts of HCPS; correct?

23 A. Correct.

24 (HCPS/Lader Exhibit 2 was marked.)

CONFIDENTIAL

Page 39

1 MR. WHITELEY: I'm going to mark Tab 10
2 as Exhibit 2. For the record, this is a document
3 produced by the District with the Bates-stamp
4 517365.

5 BY MR. WHITELEY:

6 Q. Do you have Exhibit 2 in front of you?

7 A. Yes.

8 Q. And this is an email chain between you
9 and Renee Villareal; is that correct?

10 A. Yes.

11 Q. On the first page of this document, the
12 email on the bottom half of the page is from you
13 to Ms. Villareal?

14 A. Correct.

15 Q. It has your signature block at the
16 bottom?

17 A. Yes.

18 Q. And your signature block also has these
19 links to Harford County Public Schools' social
20 media accounts; right?

21 A. Yes.

22 Q. HCPS encourages students and parents to
23 follow it on these accounts; correct?

24 A. Correct. I encourage parents and
25 guardians. I don't encourage students.

CONFIDENTIAL

Page 40

1 (HCPS/Lader Exhibit 3 was marked.)

2 MR. WHITELEY: I'm going to mark Tab 11
3 as Exhibit 3. For the record, this is a document
4 produced by the District bearing Bates number
5 264167.

6 BY MR. WHITELEY:

7 Q. Do you have Exhibit 3 in front of you?

8 A. Yes.

9 Q. If you could turn to page ending in 170,
10 the numbers in the bottom right hand of the page.

11 Actually, before we do that, this is the
12 handbook, the student/parent handbook for the
13 '18/19 school year.

14 Do you know what the student/parent
15 handbooks are as a general matter?

16 A. Yes.

17 Q. What are they?

18 A. A tool to provide information to parents
19 and guardians about practices within the system
20 that they should be aware of.

21 Q. It also provide information to the
22 students; correct?

23 A. If a student chose to access it, yes.

24 Q. Is it given to students in the district?

25 A. No.

CONFIDENTIAL

Page 41

1 Q. Students don't receive copies of this at
2 the start of school years?

3 A. They receive an abbreviated version if
4 the school produces a -- what do they call it --
5 not a cap, not a journal. What do they call that
6 at the beginning of the year? It has a calendar,
7 and it has pieces of the handbook that are
8 directly related to students. I can't recall what
9 the name of it is.

10 Q. If you could turn to page 170. Let me
11 know when you're there.

12 A. I'm there.

13 Q. Do you see about in the middle of the
14 page the paragraph that's titled Website & Social
15 Media?

16 A. Yes.

17 Q. It says, "The school system's website
18 HCPS.org offers information and meets the needs of
19 parents, guardians, students, staff, and the
20 general community." Correct?

21 A. Correct.

22 Q. And the last sentence of this paragraph
23 says, "Android and iPhone users should check out
24 the school system's mobile site for announcements,
25 a downloadable calendar and quick links."

CONFIDENTIAL

Page 42

1 Correct?

2 A. Correct.

3 Q. Below that, it says, "Follow us on
4 Facebook, Twitter, Instagram and YouTube."

5 Correct?

6 A. Correct.

7 Q. It doesn't say only parents should
8 follow us on Facebook, Twitter, Instagram and
9 YouTube; correct?

10 A. It does not say "only"; correct.

11 Q. Why does the district want individuals
12 to follow it on social media accounts?

13 A. Because with appropriate parent and
14 guardian use of social media, we can provide
15 information in a fast and easily accessible way so
16 that a parent doesn't have to be connected to
17 email or searching out a website.

18 We understand that many people use
19 social media to get information. And so if it
20 is -- it makes it easier for us to connect with
21 parents and guardians, we're going to try to take
22 advantage of that opportunity.

23 Q. So it can be an effective way for the
24 district to communicate; right?

25 MR. LEGG: Object to the form.

CONFIDENTIAL

Page 43

1 Foundation.

2 THE WITNESS: With responsible adult
3 use, yes. I agree with that statement.

4 BY MR. WHITELEY:

5 Q. You say responsible adult use. What do
6 you mean by that?

7 A. So what I mean by that is adults who are
8 educated about social media and who utilize it
9 appropriately. For example, I have -- I even have
10 some adults who utilize social media in a negative
11 format. And so that can be detrimental to the
12 system when a parent gets a text message from a
13 student who is in a school claiming information
14 that they've heard from friends and then the
15 parent goes and comments on one of our posts on
16 social media and then, as I shared earlier, having
17 to then go back and try to clean that up and try
18 to correct that information.

19 That's what I mean by appropriate and
20 professional use by adults who are aware of the
21 damage they can do if they put inaccurate
22 information on social media.

23 Q. So if I understand the example you just
24 gave, you're talking about sort of getting on the
25 telephone where students convey information to

CONFIDENTIAL

Page 44

1 each other that trickles up to an adult who then
2 repeats the misinformation in a comment or
3 something else on social media?

4 A. It's not even that. It's that in
5 addition to students doing the same thing.
6 They'll go straight to our social media pages and
7 ask questions or write what they claim is
8 happening in their classroom or with another
9 student. They'll put names on there. They'll
10 write it.

11 We've had people accuse staff members of
12 having affairs with other staff members that was
13 not accurate information. And through research
14 and investigation with multiple departments,
15 sometimes external law enforcement, not in the
16 case of the adulterating, but in other situations,
17 we are typically able to find out the source of it
18 and determine that it was not credible.

19 (HCPS/Lader Exhibit 4 was marked.)

20 MR. WHITELEY: I'm going to mark Tab 13
21 as Exhibit 4. For the record, this is a document
22 produced by the district bearing Bates No. 48085.
23 BY MR. WHITELEY:

24 Q. Do you have Exhibit 4 in front of you?

25 A. Yes.

CONFIDENTIAL

Page 45

1 Q. This is an email from you to a lot of
2 what looks like listservs and other recipients
3 within HCPS; correct?

4 A. Correct. I have a list of groups like
5 this. This is a group that I will send a weekly
6 communications plan to. So if there's something
7 going out systemwide, I'll send it to them first
8 as leaders in the system. You'll see it's Board
9 of Education principals, assistant principals,
10 lead secretaries and PBWs.

11 Q. What do you mean by PBWs?

12 A. People/personnel workers.

13 Q. What is their role in the district?

14 A. I don't think I'm the best person to
15 speak to their specific role, but they are a
16 leadership role, and that's way I include them as
17 an alert of anything going out systemwide.

18 Q. This was an August 2023 email about a
19 back to school video message from Dr. Bulson and
20 other individuals?

21 A. Dr. Poynton and Melissa Hahn, the
22 president and vice president of the Board of
23 Education are also in the video, yes.

24 Q. And Dr. Bulson is the superintendent?

25 A. Correct.

CONFIDENTIAL

Page 46

1 Q. Looking at the third paragraph from the
2 bottom on the first page of this document, it
3 starts with, "We hope you'll follow..."

4 Do you see that paragraph?

5 A. Yes.

6 Q. You wrote, "We hope you'll follow HCPS
7 in your individual school on social media,
8 (Facebook, Instagram, Twitter, and YouTube) for
9 updates throughout the year. After you review the
10 back to school information on HCPS.org, use our
11 new email, AskHCPS@hcps.org, for any questions.

12 So this communication -- strike that.
13 Let me ask it this way.

14 Do you see where it says Email Content
15 towards the top of the page?

16 A. Yes.

17 Q. That reflects that this, the message
18 from there down, was sent out to the community,
19 correct, the HCPS community?

20 A. Staff and family. That's in the first
21 paragraph.

22 Q. So in August of 2023, HCPS was still
23 encouraging families to follow it on social media;
24 correct?

25 A. Correct.

CONFIDENTIAL

Page 47

1 Q. Do you know if that was before or after
2 this lawsuit was filed?

3 A. I do not know.

4 (HCPS/Lader Exhibit 5 was marked.)

5 BY MR. WHITELEY:

6 Q. I'm going to mark Tab 14 as Exhibit 5.
7 I will represent to you that I pulled this
8 document from the HCPS website last week. It is
9 the 2024/2025 Parent-Student Handbook Calendar.

10 Do you have Exhibit 5 in front of you?

11 A. Yes.

12 Q. Do you recognize this document?

13 A. Yes.

14 Q. Were you involved in preparing this
15 document?

16 A. The only section that I prepared are a
17 review of the communications portion. So I was
18 not involved in preparing the rest of the
19 document.

20 Q. You said earlier that the versions that
21 are given to students may have a calendar attached
22 to them?

23 A. It's like a school planner. So the
24 school provides as a resource a planner where a
25 student would, for example, write down their

CONFIDENTIAL

Page 48

1 homework on a certain day of the calendar.

2 But the portion of this, of Exhibit 5
3 that would be in that would be specific sections
4 of the handbook piece that are specific to
5 students. I do not develop that. That comes out
6 of the chief of administration's office. So I do
7 not know which portions they choose to include in
8 that planner.

9 Q. If you wanted to figure out what
10 portions are included, who would you talk to in
11 that office?

12 A. Stephanie Wall.

13 Q. How do you spell her last name?

14 A. W-A-L-L.

15 Q. If you could turn to page 2 of this
16 document, you see the portion in the top right
17 with the photo of what I believe is Dr. Bulson,
18 and it's titled Superintendent's Pen?

19 A. Yes.

20 Q. It says, "Welcome to the 2024/2025
21 school year. Whether you are a student, parent,
22 guardian or staff member, this calendar is one of
23 the many resources we use to ensure you have
24 access to the information you need."

25 Did I read that correctly?

CONFIDENTIAL

Page 49

1 A. Yes.

2 Q. If you could turn to the next page, page
3 , do you see in the top right section titled
4 Website & Social Media?

5 A. Yes.

6 Q. Then there's blue text after the first
7 paragraph that says "Follow us on Facebook, X,
8 Instagram and YouTube." Correct?

9 A. Correct.

10 Q. X was formerly known as Twitter?

11 A. Correct.

12 Q. HCPS tracks metrics related to use and
13 engagement of its social media accounts; right?

14 A. Correct.

15 Q. Do you know how long HCPS has been
16 tracking those metrics?

17 A. I do not.

18 Q. Did it predate your start as
19 communications officer -- I'm sorry -- manager of
20 communications?

21 A. I cannot say for certain that it was
22 done prior to me being in the role. I know it has
23 been done since I started in the communications
24 office.

25 Q. So at least since 2024?

CONFIDENTIAL

Page 50

1 A. Correct.

2 Q. Is HCPS still tracking those metrics
3 today?

4 A. No. With several -- not in the same
5 capacity. We can always pull the information if
6 we need it, but we don't track at the same level.
7 After some reorganizations have taken place
8 throughout the years, we just don't have the
9 resources in our office to continue to do that on
10 a regular basis.

11 Q. Do you know when those reorgs happened?

12 A. No.

13 Q. Do you recall if it was before or after
14 the COVID-19 pandemic?

15 A. Before.

16 Q. So if you wanted to pull that
17 information today, how would you do that?

18 A. By going in through the analytics piece
19 of each of those platforms and pulling that
20 information that way.

21 Q. There's no like centralized place that
22 HCPS maintains and puts them all together?

23 A. No, not for social media.

24 (HCPS/Lader Exhibit 6 was marked.)

CONFIDENTIAL

Page 51

1 MR. WHITELEY: I'm going to mark Tab 14
2 as Exhibit 6.

3 BY MR. WHITELEY:

4 Q. Do you have Exhibit 6 in front of you?

5 A. Yes.

6 Q. For the record, this is a document
7 produced by the direct bearing Bates number
8 359771.

9 This is an email chain between you and
10 Stephanie Wall, who I believe you referenced
11 earlier; correct?

12 A. Yes.

13 Q. On April 15, 2019, you wrote to
14 Ms. Wall, "Stephanie, can you get me a copy of the
15 latest month's social media stats? Thank you."
16 Correct?

17 A. Correct.

18 Q. As of this time in 2019, was HCPS still
19 tracking those stats?

20 A. That's an example of me asking for an
21 immediate pull of those stats.

22 (HCPS/Lader Exhibit 7 was marked.)

23 MR. WHITELEY: I'm going to mark Tab 15
24 as Exhibit 7.

CONFIDENTIAL

Page 52

1 BY MR. WHITELEY:

2 Q. Do you have Exhibit 7 in front of you?

3 A. Yes.

4 MR. WHITELEY: For the record, this is a
5 document produced the district bearing Bates
6 number 539772 and was an attachment to the email,
7 Exhibit 6.

8 BY MR. WHITELEY:

9 Q. Do you recognize this document?

10 A. Yes.

11 Q. And is this a pretty typical way that
12 using analytics for the social media accounts for
13 the district would be generated in a single
14 document?

15 A. Correct.

16 Q. This shows analytics for the month of
17 March 2019?

18 A. Correct.

19 Q. How did HCPS decide which particular
20 metrics to track?21 A. It was more of a question of what
22 information was available to us. So if this was
23 the information available to us in the analytical
24 process at that time, that's what we were trying
25 to pull and try to look at to evaluate each of

CONFIDENTIAL

Page 53

1 those platforms.

2 Q. And why was HCPS tracking these metrics?

3 A. To see if the tools were useful, if it
4 was something that our parents and guardians and
5 community members were actually using as a
6 resource.

7 Q. This particular document shows analytics
8 for the HCPS website, its Facebook account, its
9 YouTube account, its Instagram account and its
10 Twitter accounts; correct?

11 A. Correct.

12 Q. Did HCPS track metrics for any other
13 website or online account to your knowledge?

14 A. Not that I know of.

15 Q. There's also arrows by some of these
16 numbers on here.

17 Do you know what those represent?

18 A. Whether it went up and down, that
19 particular number.

20 Q. Compared to a previous time period?

21 A. Yes.

22 Q. And why did HCPS track the change over
23 time of these metrics?

24 MR. LEGG: Objection to form.

CONFIDENTIAL

Page 54

1 BY MR. WHITELEY:

2 Q. Why did HCPS track the change over time
3 of these metrics?

4 MR. LEGG: Same objection.

5 THE WITNESS: Because that evaluation
6 will determine whether or not the resource
7 continues to be used by community members.

8 BY MR. WHITELEY:

9 Q. If it was used by community members,
10 that's a good thing; right?

11 A. Used appropriately, yes.

12 Q. What do you mean by "used
13 appropriately"?

14 A. Used to read, absorb, utilize the
15 information being provided versus using it to
16 perpetuate inaccurate information or comment
17 information that is not true about things that
18 were not related to that post.

19 Q. Does HCPS moderate the comments on its
20 accounts on these platforms?

21 A. What's your definition of moderate?

22 Q. Well, let me ask it this way.

23 Does HCPS ever attempt to remove
24 comments from posts on these accounts?

25 A. Absolutely, but only after consultation

CONFIDENTIAL

Page 55

1 with general counsel.

2 Q. How would HCPS go about attempting to
3 remove a comment from a post on one of these
4 accounts?

5 A. So, for example, I was -- can I be very
6 frank with my language? I don't know if you want
7 me to be quite that frank.

8 Q. We need your honest testimony.

9 A. It's just not a word I typically use.
10 So, for example, on an inclement weather day,
11 another school district closed. We did not. I
12 was called a whore. So because of free speech,
13 I'm not going to just delete it myself because I
14 don't like it, but did refer to general counsel,
15 reached out. This was, obviously, at about 4:30,
16 5:00 a.m. that this occurred because we put that
17 information out as early as we can.

18 So other school systems had already put
19 that information out. We had not. The individual
20 commented referring to us being a whore. I
21 reached to general counsel, shared that
22 information with them, asked if because of it
23 being -- the nature of the comment, if I could
24 hide it, and was granted permission at that time
25 to do that.

CONFIDENTIAL

Page 56

1 Q. Sorry to hear that.

2 (HCPS/Lader Exhibit 8 was marked.)

3 MR. WHITELEY: I'm going to mark Tab 16
4 as Exhibit 8. For the record, this is a document
5 produced by the district bearing Bates number
6 538420.

7 BY MR. WHITELEY:

8 Q. Do you have Exhibit 8 in front of you?

9 A. Yes.

10 Q. This is an email chain from June of 2021
11 between you, Ms. Wall and also Christina Paquette.

12 Do you recognize this document?

13 A. I don't recall this specific chain, but
14 I recognize my name, Christina's and Stephanie's,
15 and I'm sure it took place.

16 Q. If you look to the second page of this
17 document, ending in Bates 421, it appears to be an
18 automated message providing an update about
19 Facebook analytics.

20 Do you see that?

21 A. Yes.

22 Q. Do you recall if the district was able
23 to keep track of analytics related to its Facebook
24 account after June of 2021?

25 A. I believe that this is when I was made

CONFIDENTIAL

Page 57

1 aware that because of those departmental changes,
2 that this process was no longer taking place
3 because Ms. Wall was in a different department at
4 that point in time.

5 Maybe we got a phone call after this.
6 She may have picked up the phone to call me
7 instead if there's not an additional email chain.
8 But I think that was when she shared that that was
9 no longer happening.

10 (HCPS/Lader Exhibit 9 was marked.)

11 MR. WHITELEY: I'm going to mark Tab 17
12 as Exhibit 9. This is another document produced
13 by the district, bearing Bates number 324925.

14 BY MR. WHITELEY:

15 Q. Do you have Exhibit 9 in front of you?

16 A. Yes.

17 Q. This is an HCPS Social Media Guide;
18 correct?

19 A. Correct.

20 Q. Did you prepare this document?

21 A. Not personally.

22 Q. Do you know who prepared this document?

23 A. Ms. Wall.

24 Q. Did you oversee or have any input in the
25 creation of this document?

CONFIDENTIAL

Page 58

1 A. Yes.

2 Q. What was your role?

3 A. Most of the content I would have
4 reviewed and/or utilized resources to help
5 develop.

6 Q. At this point in time, did Ms. Wall
7 report you to? Did you report to Ms. Wall? What
8 was the relationship there?

9 A. When this was originally created,
10 Ms. Wall would have reported to me.

11 Q. So you ultimately had to sign off on
12 everything in here; correct?

13 A. Correct. But this is the caveat with
14 that. I'm not sure which rendition of this this
15 is because once Ms. Wall was no longer reporting
16 to me, edits could have been made to this that I
17 would not be privy to.

18 Q. I'll represent that the metadata from
19 this document indicates it was made
20 September 2017.

21 Would she still have reported to you at
22 that time?

23 A. I do not recall the dates that that
24 department change occurred.

25 Q. Earlier we were looking at the email

CONFIDENTIAL

Page 59

1 chain about Facebook analytics from 2021.

2 By that point, was Ms. Wall already not
3 reporting you to?

4 A. Correct.

5 Q. Other than yourself and Ms. Wall, are
6 you aware of anybody else who was involved in
7 preparing this document?

8 A. Yes.

9 Q. Who?

10 A. Lindsay Bilodeau.

11 Q. Could you spell that last name for me?

12 A. B-I-L-O-D-E-A-U.

13 Q. Anyone else?

14 A. At that time, not in the creation, but
15 we would have had several departments review it,
16 such as education services, to ensure that those
17 in charge of elementary and secondary were
18 comfortable with the content.

19 But this was created several years ago
20 initially. Again, I'm not sure if this is a
21 revisit or not without having them side by side to
22 compare.

23 Q. Do you know if the district has prepared
24 subsequent versions of this document?

25 A. Not that I was part of. And at this

CONFIDENTIAL

Page 60

1 point, I don't utilize this as a resource. I
2 don't actively provide it to schools. You'll see
3 even in my email to Ms. Villareal that you
4 referenced earlier, Exhibit 2 from 2018, you'll
5 see that my last paragraph says, "And, of course,
6 assuring them that they don't need to set up or
7 monitor social media. We have the HCPS pages in
8 order to share their good news. They just need to
9 make sure they share it with us."

10 I always share with our administrators
11 that I don't encourage them to start their own
12 because of the 24/7 monitoring, to use your words,
13 that has to take place.

14 Q. Do you know if anybody in district still
15 provides this to schools?

16 A. It may be posted somewhere in the pits
17 of some type of repository of documents that
18 someone could potentially access on their own.

19 Q. If you could turn to -- we'll start on
20 the first page. The first page says, "Social
21 media allows us to share an inside look at our
22 schools and day-to-day curriculum. There are so
23 many great things happening at our schools, and
24 social media helps us engage with our community,
25 increase public support and build community

CONFIDENTIAL

Page 61

1 partnerships."

2 Do you agree with that statement?

3 A. When this document was created, yes. I
4 would say I agreed with that statement.

5 Q. Do you still agree with that statement?

6 A. I know that I've said it several times
7 with. Appropriate adult use, yes, I would still
8 agree with this statement. However, we have
9 additional resources now. We're currently in the
10 process of adopting useful websites and the
11 features that are on those. I will continue to
12 advocate that social media is not necessary and
13 these good news and these stories could simply be
14 shared on school websites in order to alleviate
15 the issues that occur when we open things up to
16 social medias and involve comment and places where
17 people can write or say whatever they choose
18 without verification.

19 Q. And what are these additional or new
20 websites that you've mentioned?

21 A. So we are starting use with a -- our
22 current platform is called Final Site, and that's
23 where we do our phone calls, emails and text
24 messages, that mass notification product. And
25 then school websites are through a separate

CONFIDENTIAL

Page 62

1 platform through our technology department.

2 With the new program that we just
3 purchased and are in the process of implementing,
4 it's through a company called Apptegy. And with
5 this platform, I can now control the phone calls,
6 emails, text messages and the school websites from
7 one platform, so making it much easier to share
8 information, much faster to streamline that
9 distribution process.

10 And my advocacy is always for
11 streamlining and, of course, expediting because
12 parents and guardians want the information at
13 their fingertips as quickly as possible. So if I
14 can narrow it down to one platform that I'm
15 posting versus right now where once I post the
16 information, once I share the information via
17 phone, email, text, post it on our website, share
18 it with the news media, the next step that is
19 currently expected in our community is social
20 media.

21 But if I can eliminate that step because
22 then social media is the only platform that I have
23 to continue to monitor once a post is made because
24 of those comments and the information that might
25 be shared in the comments that I then have to

CONFIDENTIAL

Page 63

1 correct and/or discuss removing.

2 Q. This new system you're describing, has
3 the district already adopted and implemented
4 those?

5 A. No. We're in the process of
6 implementing it. It already went through the RFP.
7 The board approved it. It has been purchased.
8 Now we are in the process of setting everything up
9 and transitioning from our current mass
10 information system to this one.

11 Q. Is the plan for it to be the mass
12 notification system next school year?

13 A. Effective July 1.

14 Q. Have there been any discussions at the
15 board or in the district about whether to continue
16 posting this information on the district's social
17 media accounts?

18 A. No. This is my personal opinion and my
19 personal advocacy will be once we have these
20 websites established, to have that conversation.

21 However, in the past when I've had that
22 conversation, I have received pushback because
23 there are several community members who claim that
24 the social media is the best resource option for
25 them. And in a customer service-based industry

CONFIDENTIAL

Page 64

1 like education where our goal is that relationship
2 and that communication with parents and guardians
3 and community, it can be challenging to remove
4 something that a family refers to as a resource.

5 Q. What do you recall about those
6 conversations?

7 A. Which conversations?

8 Q. That you were mentioning about with
9 community members where you received pushback
10 about no longer -- potentially no longer using the
11 district's social media accounts.

12 A. I have not received pushback from
13 community. That is internal conversations with
14 other members of senior-level staff who feel as
15 though the community would be disappointed to have
16 those things removed.

17 However, that has been over the years
18 and so especially given things that have happened
19 in the past. For example, most recently we have
20 bomb threats in our schools. We have shooting
21 threats in our schools. Those things are
22 perpetuated on social media. I do think that it
23 might be ripe for the conversation again, that I
24 may be able to persuade more members of
25 senior-level staff that it would be an appropriate

CONFIDENTIAL

Page 65

1 move to remove it.

2 Q. Going back to Exhibit 9, the Social
3 Media Guide, this would be something that was
4 provided to schools in the district about
5 potentially creating their own pages on these
6 platforms; correct?

7 A. Not proactively provided, only if a
8 school reached out and asked my office how to set
9 up social media. And we would have a conversation
10 first where again I would advocate that they did
11 not and that, instead, they provided whatever good
12 news and stories they wanted to share with my
13 office, that we could post it on the HCPS platform
14 and then be the ones in charge of the moderating
15 and maintaining eyes on those posts.

16 But if the school insisted that they
17 wanted to pursue their own, we would provide this
18 resource as they needed help setting those things
19 up.

20 Q. Do you know how many individual schools
21 in the district have a Facebook account?

22 A. I do not.

23 Q. Do you know how many individual schools
24 in the district have an Instagram account?

25 A. I do not.

CONFIDENTIAL

Page 66

1 Q. Do you know how many individual schools
2 in the district from a YouTube account?

3 A. I do not.

4 Q. Do you know any individual schools in
5 the district have a SnapChat account?

6 A. I do not.

7 Q. Do you know if any individual schools in
8 the district have a TikTok account?

9 A. I do not.

10 Q. If you could go to the fourth page of
11 this document. This is ending Bates 928. At the
12 top it says Facebook Tips.

13 Do you see that?

14 A. Yes.

15 Q. The first paragraph reads, "Keep
16 messages short and meaningful. Be sure to include
17 the who, what, when, where and why for each post.
18 You want your posts to be attention grabbing as
19 your followers are scrolling through their news
20 feeds."

21 Did you write that language yourself, or
22 do you know if someone else did?

23 A. I cannot recall. It's been several
24 years, like I shared, since this was created.
25 That is most likely my language.

CONFIDENTIAL

Page 67

1 Q. Either way, you would have reviewed it
2 before the final product was made?

3 A. Yes.

4 Q. Why would a school in HCPS want its
5 posts to be attention grabbing?

6 A. Because there's a lot of information on
7 social media, and in order to ensure parents and
8 guardians see their particular information, they
9 want it to be attention grabbing.

10 Q. Then a couple paragraphs down, it says
11 Post Regularly.

12 Do you see that?

13 A. Yes.

14 Q. The paragraphs says, "We recommend at
15 least two or three posts per week, if not more.
16 Create or share content that is educational,
17 school based and relevant to your school
18 community. Share positive news stories, athletic
19 team victories and spotlight your student and
20 staff achievements."

21 Do you know if you wrote that language?

22 A. I do not know specifically, but I would
23 have reviewed it.

24 Q. And why did the district tell schools to
25 post on Facebook two or three times per week?

CONFIDENTIAL

Page 68

1 MR. LEGG: Objection to form.

2 You can answer.

3 THE WITNESS: Once you've established a
4 social media account, my conversation with each
5 administrator prior to that establishment was you
6 are choosing to establish a social media account.
7 So you need to utilize it as a resource because,
8 occasionally, what will happen is someone will
9 start a page, or say, for example, the Harford
10 County Public Schools page, if we don't post
11 something about a specific school or a community
12 member feels we've posted about one school too
13 many times, they will reach out.

14 And so this paragraph would be
15 specifically to don't set yourself up for failure
16 or criticism. If you're going to start this, you
17 need to be committed to it, and that means making
18 sure you stay consistent. Two or three times a
19 week you might be able to cover each of the
20 classrooms in your school by the end of the year.
21 You might be able to cover each of your students.
22 Because if you don't, you will be criticized for
23 leaving someone or some group or some staff member
24 out.

CONFIDENTIAL

Page 69

1 BY MR. WHITELEY:

2 Q. At the bottom of this paragraph, it says
3 to post photos as often as you can. Creating
4 photo albums is a great way to share photos, but
5 video slide shows are also an option.
6 Parents/guardians respond well to classroom and
7 fun student photos. Before posing any photos of
8 students, be sure they have signed photo release
9 forms on file.

10 Do you know if you wrote that language?

11 A. I do not recall if I specifically wrote
12 that, but again, I would have reviewed it.

13 Q. At the bottom, do you see the paragraph
14 that says, "Engage with your followers...?"

15 A. Yes.

16 Q. It says, "Engage with your followers by
17 answering any reasonable question that is asked
18 through a comment or direct message."

19 So I think this goes back to what you
20 were talking about earlier, that you have to be
21 responsive on those posts for them to be
22 successful?

23 A. If it is a reasonable question, yes, you
24 must engage and respond in order for social media
25 to be used appropriately.

CONFIDENTIAL

Page 70

1 Q. Then a couple lines down, there's a
2 sentence that says, "Followers will be more likely
3 to engage with your page if you engage with them.
4 If you find" -- I'm sorry. That's the end of the
5 sentence.

6 "Followers will be more likely to engage
7 with your page if you engage with them," do you
8 see that?

9 A. Yes.

10 Q. Was it a goal of the district for its
11 schools to get more engagement on its school
12 Facebook pages?

13 MR. LEGG: Objection to form.

14 BY MR. WHITELEY:

15 Q. You can answer.

16 A. The goal of social media innately is
17 two-way communication. That's the difference
18 between posting on a website or a posting on a
19 stagnant object or sending an email with the
20 information. At the time that this was created
21 initially, it was still new. It was still
22 something that had not developed into what I
23 believe it's developed into now.

24 So at the time, yes, you did want to
25 engage. You wanted parents to be able to say --

CONFIDENTIAL

Page 71

1 for example, we do a monthly limelight where we
2 congratulate staff members. You want those
3 comments where parents can say and students can
4 say, yes, Ms. Smith was my favorite teacher. She
5 deserves this award. She deserves this. She's
6 wonderful. She's fabulous.

7 So at the time, yes, that engagement was
8 extremely encouraged, and when it remains
9 positive, currently we also appreciate that.

10 Q. When you say what social media has
11 developed into now, are you referring to those
12 issues we talked about earlier, about
13 misinformation and other issues and comments?

14 A. I was going to say in addition to many
15 more. For example, there's a Facebook group that
16 claims to be a media outlet, but, for example, one
17 of the videos he made was in reference to me,
18 claiming to be having an affair with me because I
19 call him all the time. But it was in reference to
20 the automated calls that I send out.

21 But that type of abuse of this platform
22 is what can be extremely detrimental to the school
23 system.

24 Q. I've seen you check your Apple watch a
25 few times throughout the day. Are you checking

CONFIDENTIAL

Page 72

1 for emergencies that you need to respond to?

2 A. Yes. When I see the same subject line
3 that came through initially that I needed to step
4 out for just to make sure that it's not something
5 that I'm being asked for assistance. But we are
6 good to keep moving forward. And I believe it is
7 almost handled.

8 Q. Do you know whether this guide is still
9 published on Harford's websites, Harford County
10 Public Schools' website, that Social Media Guide?

11 A. He will comment on our Facebook pages.
12 He will comment on our posts, but this is his own
13 page that he had created and then gets shared
14 amongst community members in the school system.

15 Q. Drawing your attention back to
16 Exhibit 9, this guide, do you know if this is
17 still --

18 A. I thought you said this guy. I
19 apologize.

20 Q. Do you know if this guide is still
21 posted on HCPS' website?

22 A. I think I shared earlier that it is
23 probably still in a repository of documents, not
24 on our website. It's not on HCPS.org. So it
25 would be an internal platform. I believe it's

CONFIDENTIAL

Page 73

1 called SharePoint.

2 Q. If you could go back to Exhibit 1, which
3 was your resume, and the first page of this
4 document, you see the bullet points under the
5 Manager of Communications section?

6 A. Yes.

7 Q. That reads, "Oversee the district's
8 social media platforms including Facebook, X,
9 YouTube and Instagram, achieving consistent growth
10 in engagement 6/20/14."

11 Did I read that correctly?

12 A. "Since 2014;" correct.

13 Q. Why did you include this bullet point on
14 your resume?

15 A. To illustrate how it can be utilized as
16 a resource and how you can in growing that
17 engagement and those followers, that if used
18 appropriately, it can be helpful and something
19 that I could integrate in other positions as a
20 resume selling point. The resume is the selling
21 point. That's just one of the factors that I
22 think contributes to our success in sharing
23 information.

24 Q. Understood.

25 (HCPS/Lader Exhibit 10 was marked.)

CONFIDENTIAL

Page 74

1 MR. WHITELEY: I'm going to mark Tab 18.
2 This will be Exhibit 10.

3 BY MR. WHITELEY:

4 Q. Do you have Exhibit 10 in front of you?
5 A. Yes.

6 MR. WHITELEY: For the record, this is a
7 document produced by the district bearing Bates
8 number 347775.

9 BY MR. WHITELEY:

10 Q. Do you recognize this document?

11 A. I believe this is part of the budget
12 document.

13 Q. And do you know what part of the budget
14 document this is?

15 A. I'm looking at the year of
16 accomplishments of 2013. So I believe that in
17 that year, each department had a summary of
18 achievements and then goals prior to the sections
19 about where our budgets are allocated.

20 Q. And did you prepare this on behalf of
21 the communications department?

22 A. Yes, with support of staff. I don't
23 want to take full credit.

24 Q. And then on the first page, it lists
25 accomplishments for fiscal year 2013.

CONFIDENTIAL

Page 75

1 A. Yes. I see that.

2 Q. If you could go to page 2 of the
3 document ending in Bates 776, the last bullet
4 point before the goals section says, "Established
5 an HCPS YouTube channel for promotion of video
6 messaging regarding the school system's key
7 initiatives."

8 Do you see that?

9 A. Yes.

10 Q. So why was this an accomplishment for
11 this year for the communications department?

12 A. It provided another way to communicate
13 with our community.

14 Q. Above that, the preceding bullet points,
15 it says, "Continued to promote and enhance the use
16 of HCPS Facebook/Twitter." Correct?

17 A. Yes.

18 Q. And that was another accomplishment for
19 the communications department?

20 A. Yes.

21 (HCPS/Lader Exhibit 11 was marked.)

22 MR. WHITELEY: I'm going to mark Tab 19.
23 This will be Exhibit 11.

24 BY MR. WHITELEY:

25 Q. Do you have Exhibit 11 in front of you?

CONFIDENTIAL

Page 76

1 A. Yes.

2 Q. This is a document produced by the
3 district bearing Bates number 345353.

4 Is this another one of those budget
5 documents, but for a later year?

6 A. Yes.

7 Q. And this provides information about the
8 communications department?

9 A. Correct.

10 Q. It lists overall goals for the Board of
11 Education for Harford County and also specific
12 department objectives for the communications
13 department?

14 A. Yes.

15 Q. Did you prepare this document?

16 A. Yes, along with staff.

17 Q. This would have ultimately been included
18 in the overall budget for the HCPS system?

19 A. That's my understanding, yes.

20 Q. On the first page of this document, do
21 you see the Board of Education Goals section?

22 A. Yes.

23 Q. And board goal two says, "Engage
24 families in the community to be partners in
25 education of our students."

CONFIDENTIAL

Page 77

1 Do you see that?

2 A. Yes.

3 Q. So who sets these goals for the board?

4 A. The board.

5 Q. That was an easy question.

6 If you could turn to page 2, Bates
7 ending 354, in the third bullet point from the
8 bottom, it says, "Continue to enhance and promote
9 HCPS' positive image and credibility in the
10 community with the use of Facebook, Twitter,
11 YouTube, Instagram and HCPS.org News and Events."

12 Do you see that?

13 A. Yes.

14 Q. This is an example of how HCPS can use
15 these platforms for its benefit; right?

16 A. Correct.

17 Q. And the next bullet point says, "Between
18 July 2017 and June 2018, the Facebook total page
19 likes increased to 19,635. Twitter followers
20 increased to 12,300, YouTube channel had 21,805
21 total views, and Instagram increased to 1,917
22 followers."

23 Did I read that correctly?

24 A. Yes.

25 Q. And so HCPS included these metrics -- go

CONFIDENTIAL

Page 78

1 back to the first page. You can see there's a
2 section entitled accomplishments for fiscal year
3 2018?

4 A. Yes.

5 Q. And this bullet point is listed under
6 those accomplishments; correct?

7 A. Correct. Because our goal is to try to
8 reach all our families in any manner that we can.
9 And so to keep track of those numbers and to be
10 able to illustrate the increase in those numbers
11 would be an accomplishment.

12 Q. Because you've got to reach families
13 where they're at. They might be on social media.
14 They might be looking at the webpage; correct?

15 A. Correct.

16 Q. Earlier you mentioned something called
17 Littles University. Could you explain what that
18 is?

19 A. I would love to. The Harford County
20 Education Foundation, they are our foundation for
21 the school system, and they had approached me
22 about doing a program as an outreach for families
23 prior to students coming into the school system
24 because that can be a missed group. When it comes
25 time for parents to register for kindergarten, we

CONFIDENTIAL

Page 79

1 want them to already have an established
2 relationship with us.

3 So not only that they are familiar with
4 Harford County Public Schools, but also that
5 they're aware of key and important dates, such as
6 pre-K and kindergarten registration and
7 application windows.

8 So that was the initial conversation.
9 And one of the tools and ways that we came up with
10 was a program that I called Littles University.
11 And so each month I put out a post on Facebook and
12 Instagram letting families know that the Harford
13 County Education Foundation has an active link
14 where a book that I selected is posted for those
15 parents to register for a free copy if they have a
16 child anywhere from birth through age five.

17 If they register, that book is sent
18 directly to their doorstep. And then two weeks
19 after that, I will record a video message helping
20 parents learn how to walk through a book with
21 their child, the importance of reading. I try to
22 pick books that have certain themes or certain
23 things that we can address with parents about what
24 they can do with their children in order to
25 increase their verbal acumen, in order to increase

CONFIDENTIAL

Page 80

1 their exposure to language, to illustration, to
2 different cultures.

3 And so that video message, I walk those
4 things with them and then do that every month with
5 foundation partners.

6 Q. So this is for pre-K and the entire
7 pre-K group of students or potential students?

8 A. This is birth through age five, zero to
9 five.

10 Q. The videos that you post, these are
11 posted to the district YouTube account; correct?

12 A. They are created and posted on YouTube
13 to make them accessible, yes.

14 Q. Are these made to be played by parents,
15 by parents sitting there with their children
16 watching along? What is the audience?

17 A. Correct. The intended audience is an
18 adult figure in that child zero to five life and
19 then to walk through that book with me leading
20 that conversation, but the parent is with the
21 child.

22 Q. How long has this program been in place?

23 A. I believe this is my seventh year. No.
24 That's not true.

25 I don't know exactly. I think we're

CONFIDENTIAL

Page 81

1 maybe at year five.

2 Q. Did it start before or after the COVID
3 pandemic?

4 A. It started during COVID. And the reason
5 that I know that for a fact is because when I
6 started, I was able to actually read the book on
7 the video because those copyright laws were
8 suspended for a time during that. That's the only
9 reason that I can say for sure it started during
10 that time.

11 We have been fortunate enough that the
12 foundation has continued to support it after
13 COVID.

14 (HCPS/Lader Exhibit 12 was marked.)

15 MR. WHITELEY: I'm going to mark Tab 21.
16 This will be Exhibit 12. For the record, this is
17 a document produced by the district bearing Bates
18 number 538342.

19 BY MR. WHITELEY:

20 Q. Do you have Exhibit 12 in front of you?

21 A. Yes.

22 Q. This is an email chain from 2021 between
23 yourself and Deb Merlock.

24 Who is Ms. Merlock?

25 A. The president of the foundation.

CONFIDENTIAL

Page 82

1 Q. What foundation are you referring to?

2 A. The Harford County Education Foundation.

3 Q. AND what does the foundation do to your
4 knowledge?

5 A. The foundation provides resources for
6 schools, such as a Tools for Schools space where
7 teachers can go and take whatever supplies they
8 need. Most recently we held a golf tournament to
9 raise funds that are then put back in the
10 classrooms in different formats.

11 Littles University is part of the
12 foundation. We just started a program at the
13 hospitals where they give a bag to new parents,
14 and that bag has HCPS 1Z. It's all kind of tools
15 to try to connect and provide resources. They
16 have a book in that bag. They encourage them to
17 start learning and following the foundation, the
18 school system so that we're preparing kids as
19 early as we can.

20 Q. And do you know how much the Harford --
21 sorry. It's the Harford Education Foundation?

22 A. Harford County Education Foundation,
23 also referred to as HCEF.

24 Q. Do you know how much money HCEF has
25 spent providing these sorts of things for either

CONFIDENTIAL

Page 83

1 HCPS or HCPS students?

2 A. I would not even be able to begin to
3 imagine.

4 Q. Is that a high number, or you just don't
5 know?

6 A. I think it's a fabulous resource that
7 was established many years ago. It started as the
8 Greater Excellence in Education Foundation or
9 GEEF. And it focused on specific schools at that
10 time but then expanded that support to all
11 schools.

12 Q. Has the relationship between HCEF or its
13 predecessor name and HCPS existed the entire time
14 you've worked at HCPS?

15 A. In this role as manager of
16 communications, yes. Prior to that, I wouldn't
17 have had firsthand experience with them.

18 Q. If you could look at Exhibit 12 and turn
19 to the last page, the top of the email with the
20 date is on the previous page, but here Ms. Merlock
21 writes, "We would like to include the video
22 'Welcome to First Grade, Tristan' during the Tools
23 for Schools breakfast. Would this be okay? It's
24 a great video showing the day in the life of an
25 elementary student."

CONFIDENTIAL

Page 84

1 What do you recall about this video? Is
2 this something HCPS ended up posting? Is this
3 something HCEF made and posted?

4 A. Harford County Public Schools created
5 this video. This was a video at -- it was filmed
6 at -- at the time the school was called William
7 Paka Old Post Road where Tristan was a student.
8 With his parents' permission, we took a video
9 camera and followed him from his time getting on
10 the bus, traveling to school, going into the
11 school, in order to personalize that experience,
12 to help families visualize what it's like for a
13 child to enter the school, what they see, who they
14 interact with, as an example.

15 Q. Did HCPS post this to its YouTube page?

16 A. Yes.

17 Q. It can be reassuring for parents to see
18 what their kids are doing during the day?

19 A. Absolutely.

20 Q. It can be reassuring for children to see
21 the type of environment they're going to be in?

22 A. Correct.

23 MR. WHITELEY: Let's go off the record.

24 THE VIDEOGRAPHER: We are off the record
25 at 11:59.

CONFIDENTIAL

Page 85

1 (Recess from 11:59 p.m. to 12:34 p.m.)

2 THE VIDEOGRAPHER: We are on the record
3 at 12:33.

4 (HCPSS/Lader Exhibit 13 was marked.)

5 MR. WHITELEY: If we could mark Tab 42
6 and this will be Exhibit 13.

7 BY MR. WHITELEY:

8 Q. And we do not have a paper copy of this
9 one, but it should be displayed on the screen in
10 front of you.

11 A. Yes.

12 Q. This is a post from the district's
13 Instagram account that we captured.

Do you see that in front of you?

15 A. Yes.

16 O. Do you see the name HCPS Schools?

17 A. Yes.

18 Q. And that's the name of the district's
19 Instagram's account?

20 A. Correct.

21 Q. If you could scroll down to the text
22 accompanying the post. Well, stop there. It
23 says, "Who will be the next student member of the
24 board?"

25 Do you see that?

CONFIDENTIAL

Page 86

1 A. Yes.

2 Q. And those are HCPS students that are
3 listed there?

4 A. Correct.

5 Q. If you could scroll down to the text.
6 It reads, "11th graders, make your voice heard.
7 Want to make a difference in decisions made about
8 HCPS education? Now is your chance."

9 Did I read that correctly?

10 A. Yes.

11 Q. So the district does post content for
12 students in the district on its accounts; right?

13 A. Specifically because this is a student
14 member of the board. So that is a public-facing
15 position. So that is the reason why this was
16 shared on the HCPS account.

17 Q. The audience of this post would be
18 students within the district?

19 A. Really my audience when I do this is --
20 well, it says 11th graders. I completely admit
21 that. The goal is for the parents and guardians
22 that we know are on here to see it and tell their
23 11th grader, to ask them, do you know anything
24 about this? Did you see this? Are you aware of
25 this?

CONFIDENTIAL

Page 87

1 And so that's something we definitely
2 will utilize seldomly, but again for this one,
3 because it's a public-facing position, the student
4 member of the board, we want to make sure that
5 even the parents and guardians can encourage their
6 kids to be involved and aware. It's even better
7 if it's an actual student who reads it and sees
8 it, because we know grass roots-wise, they'll talk
9 to each other hopefully and encourage each other
10 to be involved in that decision because the
11 student member of the board does represent all
12 40,000 students.

13 Q. "Make your voice heard," your voice
14 there is referring to students; right?

15 A. Yes.

16 Q. Thank you.

17 MR. WHITELEY: We can take down Tab 42.

18 BY MR. WHITELEY:

19 Q. HCPS has a mobile app; right?

20 A. Correct.

21 Q. It has it for iPhones and iPads;
22 correct?

23 A. I don't know about iPads, but iPhones
24 and Androids, yes.

25 Q. It's available to download on the Apple

CONFIDENTIAL

Page 88

1 app store?

2 A. Yes.

3 Q. And Google Play store for Android
4 phones?

5 A. Correct.

6 Q. And what sort of content is featured on
7 the HCPS app?

8 A. It's essentially what you can find on
9 the websites, but more streamlined.

10 Q. It also allows users of the app to look
11 at content from HCPS' Facebook, Instagram, YouTube
12 and Twitter accounts?

13 A. Correct. It's a pull from that live
14 feed so that those news and stories are there as
15 well.

16 Q. So if I understand correctly, it will
17 compile those feeds from those platforms or posts
18 from those platforms and put them all into one
19 feed on the app, the HCPS app?

20 A. It's been a while since I've looked at
21 the exact logistics. I don't believe that it
22 pulls from all of them, but the ones that the
23 platform could handle pulling from, yes. I do not
24 recall, off the top of my head, exactly which
25 ones.

CONFIDENTIAL

Page 89

1 Q. Do you know who maintains and updates
2 the app for the district?

3 A. The app essentially lives on its own
4 because it's pulling that live information and
5 because most of it links to webpages. So if
6 information changes and you click on the tab in
7 the app, you're still going to the webpage with
8 the accurate information.

9 Q. Do you know who created the app
10 initially for the district?

11 A. That was under my supervision. That has
12 been in the last few years.

13 Q. And did district employees write the
14 code and build it, or did you contract out?

15 A. Correct. This is through the Final
16 Site, the mass notification system that we utilize
17 currently. So when we switch to Apptegy effective
18 July 1, it will be through Apptegy.

19 Q. And why did the district make this app?

20 A. It was through feedback from staff, from
21 families saying that they wanted that resource,
22 that an app would be easier to utilize than going
23 to the website.

24 Q. Another example of you got to meet
25 people where they are?

CONFIDENTIAL

Page 90

1 A. Exactly.

2 Q. Does the HCPS app allow for users to
3 turn on notifications for the app?

4 A. Yes.

5 Q. Both the Android and IOS apps are still
6 available today?

7 A. Yes.

8 (HCPS/Lader Exhibit 14 was marked.)

9 MR. WHITELEY: I am I'm going to mark
10 Tab 29. This will be Exhibit 14. For the record,
11 this is a document produced by the district
12 bearing Bates number 467611.

13 BY MR. WHITELEY:

14 Q. Do you have Exhibit 14 in front of you?

15 A. Yes.

16 Q. This is an email chain between you, Kyle
17 Andersen and Jason Berends; correct?

18 A. Correct.

19 Q. In the top email Mr. Andersen writes,
20 Missed "this on Friday. If you haven't yet, go
21 ahead and do it. The Facebook stats are great.
22 8,200 views."

23 Do you see that?

24 A. Yes.

25 Q. Going to the second page of this

CONFIDENTIAL

Page 91

1 document, he's talking about a video related to
2 music that HCPS posted; correct?

3 A. Let me read through it very quickly.

4 Q. Sure.

5 A. Go ahead. Repeat the question.

6 Q. This email chain is about a video that
7 the district posted to its YouTube and Facebook
8 accounts?

9 A. Yes. It appears those were the two
10 places it was posted.

11 Q. Mr. Andersen's email at the top, he says
12 this video got 8,200 views on Facebook; correct?

13 A. At the top on the first page, yes.

14 Q. Do you know if the district was still
15 tracking Facebook-related data at this point in
16 2023?

17 A. I do not know.

18 Q. Do you know where Mr. Andersen got this
19 information about the view count?

20 A. On the post, you can see how many views.

21 Q. Do you know if he looked at it there
22 versus somewhere else to obtain this information?

23 A. I do not.

24 (HCPS/Lader Exhibit 15 was marked.)

25 MR. WHITELEY: I'm going to mark Tab 5.

CONFIDENTIAL

Page 92

1 This will be Exhibit 15. For the record, these
2 are discovery responses from HCPS that were
3 provided to us in April of this year.

4 BY MR. WHITELEY:

5 Q. Do you have Exhibit 15 in front of you?

6 A. Yes.

7 Q. Have you ever seen this document before?

8 A. I don't know.

9 Q. If you could turn to about halfway
10 through the total document, there's an attachment
11 A. If you could look at these two pages. They're
12 called Worksheets.

13 Have you seen any of these worksheets
14 before?

15 A. No.

16 Q. If you look at the first worksheet
17 titled Program/Department Worksheet, do you see
18 about two-thirds of the way on the list there's a
19 line item for communications?

20 A. Yes.

21 Q. And then -- well, first let me ask, did
22 you provide any information related to these
23 figures that you see here on the worksheets?

24 A. I was asked to give an estimate amount
25 of the amount of that I spend on social media in

CONFIDENTIAL

Page 93

1 my professional capacity.

2 Q. What do you mean by the amount of time
3 you spend on social media in your professional
4 capacity?

5 A. The amount of time that I spend
6 addressing communications issues on social media
7 or posting original information on social media.

8 Q. And so this next column over to the
9 right under the heading Subtotal Fiscal Year 2016
10 to 2024, I take this to mean that the
11 communications budget for all of those years
12 combined together is about \$4.2 million.

13 Does that seem correct to you based on
14 your experience in the communications department
15 at Harford County Public Schools?

16 A. Yes.

17 Q. And then the 60 percent weight, is that
18 what you were discussing when you said the
19 estimate of time that you spent?

20 A. Correct.

21 Q. Did you provide any other estimates or
22 information for these other departments or
23 programs?

24 A. No, I did not.

25 Q. If we could go to the written part of

CONFIDENTIAL

Page 94

1 the document, page 3, it's a little earlier in the
2 document. Let me know when you're there.

3 A. I'm there.

4 Q. Do you see this is table that starts on
5 the bottom of page 3?

6 A. Yes.

7 Q. Have you seen that before?

8 A. No.

9 Q. Other than counsel for HCPS, did you
10 talk to anybody about this estimate of time or
11 budget that you provided later in the worksheet?

12 A. The estimate of the 60 percent of my
13 time, I did not speak with anyone else about that.
14 It really is conservative given the amount of time
15 that I deal with social media issues. But I came
16 to that number on my own.

17 Q. Did you look back at any documents or
18 records when you were coming up with that
19 percentage?

20 A. No. I didn't need to because it's my
21 daily experience.

22 Q. Do you have to bill your time or
23 otherwise keep time records at HCPS?

24 A. No. I'm exempt, and I'm on call 24/7.

25 Q. Do Mr. Andersen or Mr. Berends have to

CONFIDENTIAL

Page 95

1 keep time logs or bill their time in any way?

2 A. No.

3 Q. And you said you've spent this time on
4 social media issues.

5 What of your responsibilities and
6 activities are you including in that 60 percent?

7 A. So that's dealing with -- unfortunately,
8 the smallest part of that is dealing with putting
9 information out. The largest portion of that
10 percentage and, like I said, it really is more
11 than that -- I was being conservative -- but it's
12 dealing with, for example, when someone forwards
13 me a screenshot from a TikTok or a SnapChat and
14 I'm being asked to address it and it doesn't say
15 what school. It just has come to a student.
16 Students are passing it around.

17 Then I have to follow up with safety and
18 security, with law enforcement, do that
19 investigation to figure out where it's coming
20 from, because again, it's on social media and it's
21 been shared. So that comes under my purview. I'm
22 following up with that, trying to figure that out.
23 Same thing when something is said about a staff
24 member.

25 Right now we have a particular

CONFIDENTIAL

Page 96

1 individual on our Facebook page who is repeatedly
2 writing negative comments about one of our
3 administrators unsolicited on unrelated posts. It
4 is becoming quite detrimental for her and her
5 mental health, and so following up on those as
6 quickly as we can, whether it's at 5:00 a.m. or
7 9:00 p.m. or 11:00 p.m.

8 So that's why I say at least 60 percent
9 of my day, unfortunately, is spent facilitating
10 those conversations and trying to figure out where
11 those things are originating and then following up
12 with students, with staff, with whoever it may be
13 impacting.

14 Bullying is another example. We will
15 have parents send us snapshots of things that
16 other children said to their child and then asking
17 us as a school system to follow up, whether it
18 happened during the school day or not, because, of
19 course, then they're put in the environment
20 together. So you have to navigate that and ensure
21 the safety of all the students involved.

22 Q. I know that was a long answer, but
23 anything else that you were including in that
24 60 percent estimate?

25 MR. LEGG: Objection. Form.

CONFIDENTIAL

Page 97

1 You can answer.

2 THE WITNESS: I'm trying to think what
3 else we do on social media. I think that might be
4 sufficient for now.

5 BY MR. WHITELEY:

6 Q. Do you know when you provided that
7 estimate?

8 A. When asked for it.

9 Q. Was that in the last few months? Was
10 that last year?

11 A. Yeah, last few months.

12 Q. Have you ever had conversations --
13 separate from in-house or outside counsel for the
14 district, have you had conversations with other
15 HCPS employees about this lawsuit?

16 A. No.

17 Q. Have you prepared any public statements
18 on behalf of HCPS related to this lawsuit?

19 A. No.

20 Q. Has the district engaged any PR firms
21 or -- I'll call them PR firms -- to handle
22 communications related to this lawsuit?

23 A. Not that I'm aware of.

24 | (HCPS/Lader Exhibit 16 was marked.)

CONFIDENTIAL

Page 98

1 MR. WHITELEY: I'm going to mark Tab 32.
2 This should be Exhibit 16. For the record, this
3 is a document produced by the district bearing
4 Bates number 465458.

5 BY MR. WHITELEY:

6 Q. Do you have Exhibit 16 in front of you?

7 A. Yes.

8 Q. This is an email chain between you and
9 Mary Beth Stapleton and then Lindsay Bilodeau;
10 correct?

11 A. Bilodeau, yes.

12 Q. Bilodeau. From October 2021; correct?

13 A. Yes.

14 Q. And who is Mary Beth Stapleton?

15 A. The manager of family and community
16 partnerships.

17 Q. And what's your understanding of that
18 role in the district?

19 A. She works with parents to ensure a
20 successful connection between the school system
21 and the parent, make sure -- like you said before,
22 meet them where they are, make sure that the
23 resources are available and that questions that
24 are predominant among parents are addressed.

25 Q. Is she in a separate department from

CONFIDENTIAL

Page 99

1 you?

2 A. Yes. There's an overall department
3 title, if you look at the actual organization
4 chart, that's called communications and family
5 partnerships, but then underneath of that is
6 communications, and it's family partnerships. So
7 we do not work together daily. It is two separate
8 departments.

9 Q. So neither one of you reports up to the
10 other; is that right?

11 A. No; correct.

12 Q. Do you both report up to the same
13 person?

14 A. I'm not sure if she still reports to
15 Dr. Davis, but I do.

16 Q. And who is Dr. Davis?

17 A. Chief of administration. I believe on
18 human resources records, I report directly to
19 Dr. Davis and Dr. Bulson. But that has changed
20 throughout the years. That could be different.
21 It could just be Dr. Davis at this point. But my
22 most recent knowledge is Dr. Bulson and Dr. Davis.

23 Q. If you could go to the second page of
24 this document ending in Bates 459, Ms. Stapleton
25 emailed you October 19, 2021. She wrote, "Hi,

CONFIDENTIAL

Page 100

1 Jillian. Can you offer a suggestion of an
2 administrator that is savvy on social media, what
3 students are doing on social media (the
4 challenges, et cetera)?"

5 And she said, "I'd like it if we could
6 offer a Parent Academy Real Talk on Social Media
7 101 for parents."

8 Did I read that correctly?

9 A. Yes.

10 Q. And then you respond. It starts on the
11 previous page and continues onto this page. But
12 looking at the previous page, you wrote, "Hi, Mary
13 Beth. I think Brad is asked for a lot in this
14 arena, but Brad Spence is the only one that comes
15 to mind. He researches and stays up to date on
16 the newest social media platforms, et cetera."

17 Who is Brad Spence?

18 A. He is the principal of Havre de Grace
19 Middle/High School.

20 Q. Why was Mr. Spence the only one who came
21 to mind for you?

22 A. Because he's the only one that utilizes
23 additional social media platforms beyond what the
24 school system does to my knowledge at that date.

25 Q. Do you know what platforms he or the

CONFIDENTIAL

Page 101

1 school used at this time?

2 A. Beyond Facebook and Instagram and what
3 was Twitter at the time, I believe looking at the
4 date, I do know that he was utilizing additional
5 platforms, but I don't know the specifics.

6 Q. Do you know if that school used TikTok?

7 A. I do not know for sure.

8 Q. Do you know if they used SnapChat?

9 A. I do not know for sure.

10 Q. Have you had conversations with
11 Mr. Spence about his specific school's social
12 media presence or accounts?

13 A. Yes.

14 Q. How many times did you talk with him
15 about that?

16 A. I couldn't say.

17 Q. What do you recall about these
18 conversations with Mr. Spence?

19 A. I used Mr. Spence as a resource to
20 understand where he saw value in utilizing
21 additional social media platforms because I did
22 not from a system perspective. And so I was
23 asking what his feedback was as to how he felt it
24 was a resource. And in his community, he felt as
25 though it was.

CONFIDENTIAL

Page 102

1 And he was able to connect directly with
2 his students through those platforms as well as
3 his parents and guardians and community members,
4 whereas here at the district level, it did not
5 seem an appropriate fit for my department given
6 our lack of resources to moderate and oversee and
7 produce content for all of those different
8 platforms as well as the concerns that I was
9 seeing on these platforms is why this whole string
10 came about.

11 Ms. Stapleton was attempting to address
12 safety issue with social media and addressing how
13 students could be better guided to utilize it
14 appropriately versus, for example, at that time I
15 do believe, given the fact that there's a
16 reference to having a state police member
17 representative on that Parent Academy Real Talk,
18 which is a video, this most likely was around the
19 time where we had received screenshots or
20 forwarding of videos and things where students
21 were making threats, whether bombs or personal or
22 whatever it may be. But that would have been the
23 impetus behind this conversation.

24 Q. Did Mr. Spence tell you why he thought
25 he was able to connect with students through those

CONFIDENTIAL

Page 103

1 platforms as well as parents and guardians and
2 community members?

3 A. I'm sorry. Can you repeat that? That
4 was long and I want to make sure I comment.

5 Q. Did Mr. Spence in these conversations
6 tell you why he thought he was able to connect
7 with students on these platforms as well as
8 parents, guardians and community members?

9 A. I think that in the school environment,
10 it's much smaller than the district level. And so
11 while on the run, while moving through his
12 building, he could quickly create content that was
13 appropriate to share on those platforms. And so
14 that was why it was efficient for him.

15 Q. Is he still principal?

16 A. Yes.

17 Q. Do you know if he or the school still
18 maintain those accounts?

19 A. I do not know.

20 Q. Did you or anybody else at HCPS tell him
21 to stop using those accounts?

22 A. No. He was not told to stop. I always
23 caution about the moderation and staying on top
24 of, watching and being aware and addressing any
25 issues promptly when they do come up. But he has

CONFIDENTIAL

Page 104

1 been successful at doing that to the best of my
2 knowledge.

3 Q. In the last email in this chain
4 Ms. Stapleton says at the end, "I think I will
5 start with Brad."

6 Do you know if they ever discussed on
7 this issue?

8 A. I do not.

9 Q. Safe to say they had a conversation.
10 You were not a part of it?

11 A. Correct. I do believe that it occurred
12 and it would be easy to look at the YouTube video
13 of the Parent Academy that was produced.

14 Q. Since your role as a parent educator,
15 have you worked at HCPS as a teacher?

16 A. No.

17 Q. Since your role as a parent educator,
18 have you worked anywhere else as a teacher?

19 A. No.

20 Q. Have you ever worked at HCPS or any
21 other school or district as a school counselor?

22 A. No.

23 Q. Have you ever worked as a mental health
24 professional?

25 A. No.

CONFIDENTIAL

Page 105

1 Q. Have you ever worked in a school
2 district or school budget department?

3 A. No.

4 Q. Have you ever worked at HCPS or
5 elsewhere as a principal or similar school level
6 administrator?

7 A. No.

8 Q. We walked a little bit today about how
9 you may see posts or comments from students on
10 social media.

11 Are you responsible for any discipline
12 of HCPS students?

13 A. No. I would share the information with
14 the appropriate administrators who could determine
15 any appropriate disciplinary action.

16 Q. Do you have any responsibilities
17 tracking data or metrics about student discipline
18 in the district?

19 A. No.

20 Q. And you're not aware of any data that
21 you or HCPS has that tracks how much HCPS students
22 use any of defendants' platforms; correct?

23 A. Correct.

24 Q. I should clarify. Do you know who the
25 defendants are in this case?

CONFIDENTIAL

Page 106

1 A. I'm sorry?

2 Q. Do you know who the defendants are in
3 this case?

4 A. The social media platforms.

5 Q. So that includes Facebook, Instagram,
6 TikTok, SnapChat and YouTube?

7 A. Yes.

8 Q. Other than the 60 percent estimate of
9 your time we were discussing earlier, do you have
10 any data related to school or district level
11 expenditures related to students' social media
12 use?

13 A. No.

14 Q. Do you have any data for HCPS students
15 related to their mental health condition?

16 A. No. I do not personally.

17 Q. Do you have any data or information
18 about HCPS counseling students on mental
19 health-related issues?

20 A. Not in the communications office. I
21 just want to clarify, because I'm not speaking for
22 the system. I'm just speaking for me. I know
23 this happens in other departments. I just want to
24 be clear.

25 Q. I'm asking what you know and what you're

CONFIDENTIAL

Page 107

1 aware of.

2 A. No.

3 Q. Do you track or have any knowledge about
4 HCPS' expenditures for school counseling or
5 school-provided mental health resources?

6 A. No, I do not.

7 Q. Have you ever requested that any of the
8 defendant platforms that we discussed change or
9 modify any particular feature on their platform?

10 A. We have reached out when there has been
11 an issue of aggression or inappropriate behavior,
12 like reporting things as spam, reporting things as
13 inappropriate in an attempt to get that user
14 removed. We have not been successful.

15 Q. Other than that, have you ever requested
16 that any defendant modify any feature on their
17 platform?

18 A. No.

19 Q. Have you ever requested that any of the
20 defendant platforms stop or discontinue a certain
21 feature of their platform?

22 A. No.

23 Q. And separate from the reach out you just
24 described about potentially getting posts or
25 content removed, have you ever spoken with anyone

CONFIDENTIAL

Page 108

1 from the defendants about their platforms?

2 A. Spoken to an actual person?

3 Q. Yes.

4 A. No.

5 Q. Have you spoken to not a person about
6 the defendant platforms?

7 A. I just wanted to clarify who the
8 intended recipient was.

9 No, we have not spoken with someone,
10 whether AI or person.

11 Q. Does HCPS allow students to use cell
12 phones during the school day?

13 MR. LEGG: Objection to form.

14 THE WITNESS: I think that in the new
15 policy, it's clarified as to when and where that
16 can be used. Because I'm not intricately involved
17 in that use, I don't know that policy word for
18 word.

19 BY MR. WHITELEY:

20 Q. So you weren't involved in drafting that
21 policy?

22 A. No. I would have distributed it to
23 families via our mass communication tool, but it
24 was not necessary for me to review that data or
25 that actual policy because I wasn't going to make

CONFIDENTIAL

Page 109

1 edits to a board policy.

2 Q. So the board is part of the organization
3 that adopts this?

4 A. Correct, the Board of Education of
5 Harford County.

6 Q. Have you ever used YouTube?

7 A. Yes.

8 Q. Do you have a YouTube account?

9 A. I have a YouTube account set up, yes.

10 Q. Do you know when you set it up?

11 A. It was within the last year.

12 Q. Is this a personal account or a
13 professional account?

14 A. This is a professional account for my
15 daughter who has started a film and commercial
16 acting career.

17 Q. That's exciting.

18 You say you started that within the last
19 year?

20 A. Yes. It was -- I know for a fact that
21 the career started in February of 2024. And so it
22 was after that fact. It was established when one
23 of her auditions required that I submit a link, a
24 YouTube link. Otherwise, I would not have
25 established a YouTube channel for her.

CONFIDENTIAL

Page 110

1 Q. And separate from that account for your
2 daughter, do you have your own personal YouTube
3 account?

4 A. No.

5 Q. Do you have a Facebook account?

6 A. Yes.

7 Q. How long have you had a Facebook
8 account?

9 A. Since I was in college.

10 Q. Do you have an Instagram account?

11 A. Yes.

12 Q. Also since college?

13 A. No. I'm that old that I don't know that
14 it was around in college. So I can't say exactly
15 when.

16 Q. Do you have a SnapChat account?

17 A. No.

18 Q. Do you have a TikTok account?

19 A. Absolutely not.

20 Q. Why do you say "absolutely not"?

21 A. Because in my professional capacity, I
22 see the dangers, the vitriol and the damage that
23 can be done on those platforms.

24 Q. And what do you mean by that, the
25 damage?

CONFIDENTIAL

Page 111

1 A. I mean the fact that I see regularly
2 children bullying one another because I'm being
3 sent those images and then being asked to navigate
4 that at the school level with administrators. I
5 see the bomb threats. I see the violence, gun
6 violence. I see the racism.

7 We have students who as part of a
8 Scrabble day at school found the letters amongst
9 their peers and went into the library and took a
10 picture of themselves lined up spelling the word
11 N-I-G-G-E-R. That went viral. Dealing with that
12 and the fallout, I will not voluntarily
13 participate in any of those platforms.

14 Q. Other than your daughter's YouTube
15 account that was made within the last year, do you
16 know if your daughter has any other social media
17 accounts?

18 A. My daughter does not have any social
19 media accounts. I run an Instagram account for
20 her same professional capacity. That is private
21 though. Even in a professional capacity, I am not
22 willing to make that public.

23 Q. When you say private, you mean the
24 account setting on the platform?

25 A. The account setting is private, and

CONFIDENTIAL

Page 112

1 someone must request to follow the page that I
2 have set up for my daughter's professional
3 experience.

4 Q. Are there any other accounts you've set
5 up for your daughter other than the YouTube and
6 Instagram accounts?

7 A. No.

8 Q. Do you have any other children?

9 A. No.

10 Q. And how old is your daughter?

11 A. She is seven.

12 Q. Have you ever used YouTube Music?

13 A. No.

14 Q. Have you ever used YouTube Kids?

15 A. No. I don't trust that because of the
16 commercials. You never know what's going to pop
17 up.

18 Q. What do you mean by that?

19 A. I mean that we've had parents reach out
20 to share that when their child was directed to a
21 YouTube link to watch something in particular for
22 like a school assignment or something and then an
23 ad popped up, and they claim that it had
24 certain -- it could be content that has -- the one
25 that's popping into mind, I believe they claimed

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Page 113

1 that it had some kind of sexual connotation on the
2 kid's platform.

3 Now, I can't speak to the validity of
4 that because, of course, there's no video or photo
5 of it, but a parent calling and complaining about
6 that is, obviously, something we're going to take
7 very seriously as a school system. Consequently,
8 just from that knowledge, I won't allow my
9 daughter to watch that.

10 Q. And the district to your knowledge does
11 allow YouTube to be used in a classroom; correct?

12 A. I do believe that they use it as a
13 resource.

14 Q. And it can also be assigned as a part of
15 homework; right?

16 A. I can't speak to that.

17 Q. Other than -- strike that.

18 Do you recall any other parent
19 complaints specific to YouTube that you've
20 received?

21 A. Specific to YouTube, no. YouTube
22 doesn't have the same format of comments. It's
23 not something that's used as much as on, for
24 example, Facebook. So I personally believe that
25 that's why we don't see as much interaction on

CONFIDENTIAL

Page 114

1 there or as many issues with the content. It's
2 more that in-between video piece, those
3 advertisements and things that pop up
4 uncontrollably.

5 Q. Have you provided your daughter with a
6 smartphone or a tablet?

7 A. Absolutely not.

8 MR. WHITELEY: Go off the record?

9 MR. LEGG: Yes.

10 THE VIDEOGRAPHER: We are off the record
11 at 1311.

12 (Recess from 1:11 p.m. to 1:20 p.m.)

13 THE VIDEOGRAPHER: We are on the record
14 at 1320.

15 BY MR. WHITELEY:

16 Q. Ms. Lader, I understand your job has
17 required you to be checking your phone and devices
18 throughout the day. But I just want to confirm
19 you have not discussed the substance of your
20 testimony with anybody?

21 A. No.

22 Q. Thank you. Earlier we were talking
23 about a video called Social Media 101 or something
24 similar.

25 Do you recall that discussion?

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Page 115

1 A. Part of Ms. Stapleton's Parent Academy
2 Real Talk series, yes.

3 Q. Do you know if that video was ever
4 published on YouTube or some of the other accounts
5 run by HCPS?

6 A. I could not confirm positively.

7 Q. Do you know if that video was published
8 and later taken down?

9 A. That would surprise me. We don't
10 typically take down things that we have posted as
11 resources of information for our community.

12 Q. And why is that? Why do you not
13 typically take things down?

14 A. Once it's posted, if we were to take it
15 down, what can typically happen is then we get the
16 deluge of there was this resource. Now we can't
17 find it. Where is it?

18 And typically it's information that we
19 do like for historic purposes. We would want to
20 have that out there to illustrate, okay, at this
21 time we shared this information.

22 Q. If it was taken down, do you know who
23 would have made that decision to take it down?

24 A. It could have been one of several
25 people. In that case, it probably would have come

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Page 116

1 from someone like Ms. Stapleton if she said that
2 she wanted it removed, or if it had some type of
3 sensitive information that safety and security
4 wanted removed, just thinking about who was on
5 that email chain referenced as additional guests.
6 I would assume it would be someone from one of
7 those departments.

8 And I remember seeing Donoven's name and
9 State Police. So that's why.

10 Q. Thank you for your time, Ms. Lader.
11 Pending questions from counsel, I have no further
12 questions for you.

13 MR. LANDS: I have no questions.

14 MR. WHITELEY: Any questions from any
15 defendants who are attending on Zoom?

16 Can we hear them if they are speaking?

17 THE VIDEOGRAPHER: Yes.

18 MR. WHITELEY: There's usually not, but
19 I just wanted to check.

20 MR. LEGG: I'll reserve my questions for
21 trial.

22 THE VIDEOGRAPHER: We are off the record
23 at 1322.

24 (Whereupon, at 1:22 p.m., the taking of
25 the instant deposition ceased.)

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Page 117

1 COMMONWEALTH OF PENNSYLVANIA)

2 COUNTY OF ALLEGHENY) SS:

3 C E R T I F I C A T E

4 I, Ann Medis, RPR, CLR, CSR-WA and
5 Notary Public within and for the Commonwealth of
6 Pennsylvania, do hereby certify:

7 That JILLIAN LADER, the witness whose
8 deposition is hereinbefore set forth, was duly
9 sworn by me and that such deposition is a true
10 record of the testimony given by such witness.

11 I further certify the inspection,
12 reading and signing of said deposition were not
13 waived by counsel for the respective parties and
14 by the witness.

15 I further certify that I am not related
16 to any of the parties to this action by blood or
17 marriage and that I am in no way interested in the
18 outcome of this matter.

19 IN WITNESS WHEREOF, I have hereunto set
20 my hand this 13th day of May, 2025.



23 Notary Public

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Page 118

1 COMMONWEALTH OF PENNSYLVANIA) E R R A T A
2 COUNTY OF ALLEGHENY) S H E E T

3 I, JILLIAN LADER, have read the foregoing pages of
4 my deposition given on May 12, 2025, and wish to
make the following, if any, amendments, additions,
deletions or corrections:

5

6 Page Line Change and reason for change:

7 -----
8 -----
9 -----
10 -----
11 -----
12 -----
13 -----
14 -----
15 -----
16 -----
17 -----
18

19 In all other respects, the transcript is true and
correct.

20

21 -----
22 JILLIAN LADER

23 ----- day of -----, 2025.

24

25 -----
Notary Public

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Page 119

1 GOLKOW, a Veritext Division
2 One Liberty Place
3 1650 Market Street, Suite 5150
4 Philadelphia, Pennsylvania 19103
5 877.370.3377

6
7 May 13, 2025
8
9

10 Matthew P. Legg, Esquire
11 Brockstedt Mandales Federico LLC
12 2850 Quarry Lake drive - Suite 220
13 Baltimore, Maryland 21209
14 Re: Deposition of JILLIAN LADER
15 Notice of Non-Waiver of Signature

16 Dear Mr. Legg:

17 Please have the deponent read her deposition
18 transcript. All corrections are to be noted on
19 the Errata Sheet.

20 Upon completion of the above, the Deponent must
21 affix her signature on the Errata Sheet, and it is
22 to then be notarized.

23 Please forward the signed original of the Errata
24 Sheet to Daniel Whiteley, Esquire for attachment
25 to the original transcript, which is in his
 possession. Send a copy of same to all counsel.
 Please return the completed Errata Sheet within 30
 days of receipt hereof.

26 Sincerely,

27 Ann Medis, RPR, CLR, CSR-WA

28 cc:

29 Daniel Whiteley, Esquire
30 Brian M. Lands, Esquire
31 Mark Houston Brown, Esquire
32 Isabel King, Esquire